

# Control Measure Evaluation Criteria

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## Measure

- This can be expressed as an emission limit, VOC content limit, fuel specifications, or other requirement.

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## Description

- This provides an overall description of the source category and intent of the control measure. It is also useful to know the regulatory history for the source category, including how the potential new requirement differs from existing requirements, or control methods in-use.

## Capital Cost

- An estimate of the initial investment by the source to purchase, install, and begin operating the control equipment.

## Operating and Maintenance Cost

- Operating costs for a year of normal operation. Components are divided into fixed, variable, and consumable costs.

## Annualized Cost

- Converts the capital cost into an equivalent annual cost over the equipment life. This is added to the annual operating and maintenance cost. Credits for recovered materials are subtracted from the total (where applicable).

## Control Efficiency

- Percentage reduction from uncontrolled levels. The effects of some control methods may be additive, while others are replacements for existing control techniques.

## Cost Effectiveness

- This value is typically the ratio of the expected annualized cost to the expected annual emission benefit. For this study, three values may be of interest: dollars per ton of VOC, dollars per ton of NO<sub>x</sub>, and dollars per ton of combined VOC plus NO<sub>x</sub> reduced.



## Applicability (source sizes)

- Some measures are only applied to the largest - most cost effective to control - emitters. For example, a major stationary source in the Philadelphia-Wilmington-Trenton area ozone nonattainment is one that emits more than 25 tons per year of VOC or NO<sub>x</sub>.

## Emission reductions (annual, ozone season, episodic) by pollutant

VOC only

NO<sub>x</sub> only

VOC and NO<sub>x</sub>

Secondary pollutant benefits - other criteria pollutants, air toxics or greenhouse gases.

## Who pays?

- Sources, consumers, governments, etc.  
Some measures can impose costs on industries and consumers as control costs are passed through.

## Administration Issues/Costs

- What burden does the measure place on regulatory agencies? Which agency is responsible for implementing the control measure?

## Enforcement

- Is the measure enforceable? Can non-compliers be identified and penalized?

## Ease of Compliance Determinations

- This addresses the burden on agencies associated with implementing and enforcing a control measure, and on emission sources associated with recordkeeping and reporting.

## Implementation Ease

- This addresses the technical feasibility of implementing a control measure. Has it been implemented in other areas to similar source types?

## Timing of Reductions

- Now until 2005
- Post-2005

## Emissions Location

- This addresses whether affected sources are inside or outside the five county area, and perhaps the relative distance from the nonattainment area.

## Availability

- Is the control technology commercially available?
- High, medium, and low rankings can be assigned to differentiate those that are commercially available, demonstrated for similar, but not the same application, or in pilot plants.

## References Used in Evaluation

- Which reports or other data sources were used for this determination? Were control equipment vendors consulted?

| Potential Criteria for Evaluating Ozone Control Measures |                                      |  |
|--|--------------------------------------|--|
| 1.   | Capital Cost                         |  |
| 2.   | Operating and Maintenance Cost       |  |
| 3.   | Annualized Direct Costs              |  |
| 4.   | Control Efficiency                   | % reduction from uncontrolled levels ( OTAG uses high 90+%, medium 50-90% and low <50% )   |
| 5.   | Cost-Effectiveness                   | cost/ton for each precursor and for both precursors combined, over the lifetime of the control (OTAG proposed - <\$1,000/ton, \$1,000-5,000/ton, \$5-10,000/ton and \$10,000+/ton) |
| 6.   | Applicability                        | how many sources, their size   |
| 7.   | Emission Reductions by Pollutant     | estimated reductions-VOC only, NOx only, VOC and NOx combined, secondary pollutant benefit   |
| 8.   | Who Pays                             |  |
| 9.   | Administrative Costs/Issues          |  |
| 10.  | Enforcement <i>(Fed, Loc, State)</i> |  |
| 11.  | Ease of Determining Compliance       |  |
| 12.  | Implementation Ease                  |  |
| 13.  | Timing of Reductions - Timely        | time frame for getting precursor and ozone benefits<br>Now Until 2005 -- Post-2005   |
| 14.  | Permanence                           |  |
| 15.  | Measurable <i>(Quantifiable)</i>     |  |
| 16.  | Publicly Acceptable                  |  |
| 17.  | Politically Acceptable               |  |
| 18.  | Consensual                           |  |
| 19.  | Available                            | reliance on commercially available technology - (OTAG-available and transferable, available without proven transferability, not commercially available)                            |
| 20.  | <i>Health Effects</i>                |  |
| 21.  | <i>Economic Impact</i>               |  |

22. *Voluntary Measures??*





## Summary of Potential Control Measures for VOC and NO<sub>x</sub> by Source Category

| Source Category  | Control Measure   | Description   |
|--|---|---|
| <b>VOC Emissions: Surface Coating and Solvent Use</b>                              |   |   |
| <i>Higher RACT</i> { Industrial Surface Coating (Includes Wood and Metal Products) | (Add-on Controls or VOC Content Limits)                               | Extending the required RACT standards to smaller sources of VOC emissions (< 50 tpy) not covered by EPA's Control Technique Guidance (CTG) documents; or requiring more stringent limits, improved transfer efficiency, or add-on controls. |
| <i>over &amp; above national rule</i> { Autobody Refinishing                       | (VOC Content Limits); CA Best Available Retrofit Control Technology   | A national rule proposing VOC content limits has been proposed. Can establish more stringent VOC content limits for coatings, require control equipment to improve transfer efficiency, and require add-on controls.                        |
| <i>Improvements over CTGS</i> { Aerosol Paints                                     | CA Air Resources Board (CARB) Tier 2 Standards; SCAQMD Content Limits | Compliance expected through reformulation.  |
| Surface Cleaning/Degreasing  | CARB's Best Available Control Technology; Low-VOC Solvents            | Establishes low-VOC targets for solvents; and application methods with high collection and destruction efficiencies.  |
| <b>VOC Emissions: Petroleum Operations, Refueling, Fugitive Emissions</b>          |   |   |
| Gasoline Service Stations: Underground Storage Tanks                               | Install Pressure Vacuum (PV) Valves on Vent Line                      | Prevent excessive release of gasoline vapors from storage tank vent pipe.   |
| <i>Improvements to in-place strategies</i> { Bulk Terminals                        | Vapor Recovery System   | Reduce VOC emissions during gasoline truck tank loading.  |
| Petroleum Refinery Fugitive Emission Leaks   | Inspection and Maintenance Program                                    | Improve compliance with RACT through increased inspection frequency.  |
| <b>VOC Emissions: Miscellaneous Sources</b>  |   |   |
| Rule Effectiveness Improvements  | Increase Compliance with Regulations                                  | Options include inspections and other enforcement activities.   |
| <i>beyond RACT</i> { Web Offset Lithography  | (Carbon Adsorber)   | Require controls beyond CTG, such as enclosure installation, and VOC limits for inks.   |
| <i>controlling wood print category</i> { Graphic Arts                              | (Low-VOC Inks and Cleaning Solvents)                                  | Extend RACT requirements to small establishments.   |
| Adhesives: Industrial  | Reformulation and Product Substitution                                | Reduce VOC through improved coating types.  |
| <i>New measure</i> { Pesticides  | Reformulation to Lower VOC Content                                    | Based on California Ozone FIP rule; prohibits use of pesticides above specific VOC limits.  |

| Source Category                                  | Control Measure  | Description   |
|--|--|---|
| <b>NO<sub>x</sub> Emissions: Fuel Combustion</b> |  |   |
| Utility Boilers                                  | (Low-NO <sub>x</sub> Burner (LNB))<br>(LNB + Overfire Air)<br>Selective Catalytic Reduction (SCR)<br>Natural Gas Reburn (NGR)<br>Natural Gas Substitution<br>Selective Noncatalytic Reduction (SNCR) | Options include requiring units to meet emission standards beyond RACT requirements based on energy output or heat input. Control techniques vary by boiler type and fuel type. May also be controlled through OTC Memorandum of Understanding. <i>will</i> |
| Industrial Boilers                               | (LNB)<br>(LNB + Overfire Air)<br>SCR<br>NGR<br>Natural Gas Substitution<br>SNCR  | Control options include establishing emission limits beyond RACT requirements. Control techniques vary by boiler type and fuel type. Large industrial boilers may also be controlled through OTC Memorandum of Understanding.                               |
| Adipic Acid Manufacturing Plants                 | Thermal Reduction  | Limits can be set on pounds of  |
| Nitric Acid Manufacturing Plants                 | Extended Absorption<br>SCR<br>Nonselective Catalytic Reduction (NSCR)  | NO <sub>x</sub> per ton of acid produced.   |
| Cement Manufacturing                             | LNB<br>SCR<br>SNCR (Urea-Based)  | Require combustion controls and post-combustion controls to achieve reductions on certain processes.  |
| Glass Manufacturing                              | LNB<br>SCR<br>Oxy-Firing   | Require combustion modifications and process changes to achieve reductions beyond those required by RACT.   |
| Gas Turbines: Natural Gas                        | LNB<br>SCR + Steam Injection   |   |
| Gas Turbines: Oil                                | Water Injection<br>NSCR + Water Injection  |   |
| Reciprocating IC Engines: Diesel/Oil             | Ignition Timing Retard<br>SCR  |   |
| Reciprocating IC Engines: Natural Gas            | Air/Fuel (AF) Ratio Adjustment + ITR<br>NSCR   |   |
| Process Heaters: Natural Gas or Oil              | Ultra-Low-NO <sub>x</sub> Burners (ULNB)<br>LNB + SCR<br>LNB + SNCR  |   |
| Iron and Steel Mills                             | LNB + FGR<br>LNB + SNCR<br>LNB + SCR   | Control NO <sub>x</sub> emissions from reheating, annealing, and galvanizing furnaces.  |

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| Source Category  | Control Measure  | Description  |
|--|--|--|
| <b>NO<sub>x</sub> Emissions: Fuel Combustion (cont'd)</b>          |  |  |
| Industrial, Commercial, and Institutional Combustion               | RACT to Small Sources  | Extend RACT requirements to smaller sources.   |
| Residential Water Heaters  | LNB  | New heaters would be required to have low NO <sub>x</sub> burners.   |
| Residential Space Heaters  | LNB  | Programs can provide incentive to replace older heaters.   |
| Medical Waste Incinerators   | SNCR   | Control NO <sub>x</sub> from sterilization techniques.   |
| Municipal Waste Incinerators                                       | SNCR   | Set limits beyond EPA's requirements for large facilities.   |
| <b>VOC and NO<sub>x</sub> Emissions: On-highway Motor Vehicles</b> |  |  |
| Light-, Medium-, and Heavy-Duty Diesel Vehicles and Trucks         | California Reformulated Diesel Program   | CA limits the sulfur content and aromatic hydrocarbon content of motor vehicle diesel fuel.  |
| Light-Duty Gasoline Vehicles and Trucks                            | More Remote Sensing  | The enhanced I/M remote sensing program could be expanded.   |
| Light-Duty Gasoline Vehicles and Trucks                            | Scrappage Programs   | Early retirement of older, higher emitting vehicles.   |
| Heavy-Duty Diesel Trucks   | Vehicle Emission Inspections   | Some States are considering emission tests of heavy trucks. Primary benefit is to reduce emissions of NO <sub>x</sub> and particulates.                    |
| Light-, Medium-, and Heavy-Duty Diesel Vehicles and Trucks         | Emission-Based Registration Fees   | Vehicle operators are charged a registration fee based on annual mileage times the emission rate of one or more pollutants.                                |
| All Vehicles   | Emission Reduction Credits for Low Emission Vehicle Retrofits for Fleet Vehicles | Issue emission credits to fleet vehicle operators to low emission configurations.  |
| Light-Duty Vehicles and Light-Duty Trucks                          | Eliminate Excessive Car Dealership Vehicle Starts                                | Limit car dealers to one fleet engine start-up every two weeks.  |
| All Vehicles   | Eliminate Excessive Curb Idling  | Limit idling time to 3 minutes.  |
| Urban Buses  | Emissions Reduction Credit for Heavy-Duty Buses                                  | Issue emission reduction credit for implementation of low emission buses; require the use of low emission buses (natural gas, methanol, electric trolleys) |
| All Vehicles   | Smoking Vehicle Program  | Establishes a call-in line to report vehicles with excessive smoke emissions.  |



| Source Category   | Control Measure   | Description   |
|---|---|---|
| <b>VOC and NO<sub>x</sub> Emissions: Nonroad Vehicles</b>   |   |   |
| Marine Vessels  | Control of Emissions (NO <sub>x</sub> ) from Ships and Ports  | Reduce cruising speeds; engine modifications; clean fuels for shore side equipment; port infrastructure improvements.   |
| Commercial Marine Vessels   | Emission fees   | Based on California Ozone FIP rule; imposes NO <sub>x</sub> emission fee of \$10,000 per ton on vessel operators.   |
| Lawn and Garden   | Emission Reduction Credits for Leaf Blowers; Electric Lawnmowers  | Provide credits for local governments (or other entities) that prohibit leaf blowers, or replace with non-polluting alternatives.   |
| Nonroad   | Nonroad Engine Emission Reduction Credit Programs   | Provide credits for accelerated retirement and replacement of old engines/vehicles with zero or low-emitting units.   |
| Locomotives   | Regional Railroad NO <sub>x</sub> Emissions Reduction Measure   | Advanced diesel technologies, clean fuels, aftertreatment technologies, electrification.  |
| Aircraft  | Control of Emissions from Aircraft and Ground Support Equipment   | Single/reduced engine taxiing, reduced airport airside congestion, reduce takeoff power, use only low-emitting aircraft, tow aircraft to runway, increase load factor, GSE electrification. |
| Locomotive Engines  | Potential Federal NO <sub>x</sub> Emission Standards<br><br>Potential CA NO <sub>x</sub> Emission Standards | Establishes emission standards to be met by modifying locomotive engines.   |
| ≥175 horsepower Compression Ignition (Diesel) Engines:<br>Construction Equipment: Scrapers, Bore/Drill Rigs, Excavators, Cranes, Off-Highway Trucks, Rubber Tired Dozers, and Off-Highway Tractors<br>Logging Equipment: Fellers/Bunchers | California Phase II Exhaust Standards   | Requires modifications to compression ignition engines.   |
| Recreational Vehicles<br>2-stroke engine category<br>4-stroke engine category   | Potential CARB Standards<br>Potential CARB Standards  | Requires modifications to small, gasoline-powered engines.  |
| <b>VOC and NO<sub>x</sub> Emissions: Episodic Measures</b>  |   |   |
| Open Burning  | Ban on High Ozone Days  | Can be implemented when ozone levels are expected to exceed the Federal health standard in order to potentially avoid exceedances.  |
| Commercial Lawn Care  | Ban on High Ozone Days  |   |
| Recreational Boating  | Ban on High Ozone Days  |   |

| Source Category   | Control Measure              | Description   |
|---|------------------------------|---|
| <b>VOC and NO<sub>x</sub> Emissions: Episodic Measures (cont'd)</b> |                              |   |
| Motor Vehicles  | Voluntary "No-Drive" Measure | Encourage public to reduce driving on high-ozone days.  |
| <b>VOC and NO<sub>x</sub> Emissions: Seasonal Measures</b>          |                              |   |
| Fuel Combustion   | Gas Substitution             | Alternative fuel use during ozone season.   |
| Open Burning  | Seasonal Ban                 | Can be implemented during summer months.  |
| <b>Emission Trading Programs</b>                                    |                              |   |
| Stationary Sources  | RECLAIM (South Coast, CA)    | Includes NO <sub>x</sub> and SO <sub>2</sub> emitters of 4 tons per year or more. Emissions Cap and Allocate System.      |
| Stationary Sources  | Illinois EPA (Chicago Area)  | VOC trading program is an alternative to specified control measures for point sources. May 1-September 30 trading season. |

NOTE: Control measures in parentheses are already required in ozone nonattainment areas.





ECOS

**Ozone Transport Assessment Group**

**Mobile Sources Assessment:  
NOx and VOC Reduction  
Technologies for Consideration by  
the Ozone Transport Assessment  
Group**

**REVISED FINAL REPORT**

**Prepared by the OTAG Control Technologies & Options  
Workgroup, Mobile Sources Committee  
April 11, 1996**

**Ozone  
Transport  
Assessment  
Group**





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## SECTION 1 OVERVIEW

A wide range of strategies to reduce VOC and NOx emissions from mobile sources were evaluated by the committee. These strategies have been grouped according to the emission source they address: light duty on-highway vehicles (LDVs), heavy-duty on-highway vehicles (HDVs), and non-road engines and vehicles. The tables in Section 2 show the control strategies evaluated for each set of emission sources, along with relevant information concerning their implementation, effectiveness and cost. General descriptions of the controls are included in the appendix to this report. It should be noted that reductions in NOx and VOC emissions resulting from certain control technologies can also result in reductions in particulate matter and air toxics.

Each table shows an estimate of the earliest start date for each program. These start dates assume that OTAG makes its recommendations to EPA sometime in 1997 and that EPA proposes and promulgates its regional strategies by the end of 1998. Also shown are the number of years projected for the program to phase-in. For example, many I/M programs phase in their emission standards. They may also start with a limited number of model years and gradually expand to cover a large part of or the entire in-use vehicle fleet. Likewise, new engine and vehicle standards may apply to 30% of new vehicle sales in the first year of the program, 50% in the second year, etc., until all new vehicles sold are covered by the new requirement.

The columns headed, Years to Achieve Reduction (50%, Full), indicate the number of years after the program start date that would be required for the program's full long-term emission reduction to be achieved. Fuel programs require almost no time to achieve full benefits due to the short life of fuel once produced. Likewise, I/M-like programs also quickly achieve their full eventual benefit. New engine and vehicle programs, however, require the current fleet to wear out and be scrapped (i.e., fleet turnover) before the full benefits of the program accrue. In the second of the two columns, the term full means 90%. Particularly in the case of the new engine and vehicle strategies, turnover of the last pre-controlled vehicles could take 40-50 years, while the vast majority of the benefits accrue after 15-20 years.

The emission reduction percentages shown in the next three columns apply in the year 2007, as this is the year that attainment is required for the severe ozone nonattainment areas with design values above 17 pphm. The emission reductions shown for both LDV and HDV strategies apply to the entire on-road vehicle emission inventory, while those for the non-road engine strategies apply to the entire non-road emission inventory. For example, Basic I/M for LDVs is projected to reduce NOx emissions from LDVs by 0.6% of the NOx emission inventory from both LDVs and HDVs. For those programs showing short times to achieve full reduction, the emission reductions shown for 2007 would not change substantially over time or with a change in start date or phase-in time, as long as the program was not delayed until the 2006-7 time frame. However, for those programs showing longer times necessary to achieve their full reduction potential, the percentage emission reduction is very sensitive to the year being evaluated and will generally increase substantially in each subsequent year.



In this initial phase of information gathering and analysis, these emission reductions were determined relative to the lowest level of control existing in the OTAG region. For example, for LDVs, this was equivalent to the absence of any inspection and maintenance (I/M) program and operation on conventional gasoline. Thus, many of these strategies would not produce any emission benefit in areas already applying these controls. No single emission control baseline is applicable throughout the entire OTAG region. This aspect of the evaluation of the various control strategies is considered an implementation issue that will be addressed at a later date, in particular when the cost effectiveness of further emission controls within ozone nonattainment areas versus the control of transported emissions is addressed. Discussions with the modeling subcommittee also confirmed that the proposed regional ozone modeling would utilize emission inputs which would reflect varying levels of control in different geographical areas. For example, the addition of relatively lenient controls would reduce emissions in areas not having such controls, but would have no effect in areas already at or beyond those controls.

This approach to calculating the emission reductions also means that the emission reductions shown are generally not additive. For example, after implementation of a very stringent I/M program, there are fewer emissions to reduce via reformulated gasoline, and vice versa. The order in which the various programs are implemented can also have a very significant impact on the emission reduction associated with the individual steps. At the present time, however, the appropriate sequence for implementing the various strategies is not available, so the fairest way to present the available information is to use the same baseline for each program. Once an acceptable sequence is available, incremental costs and emission reductions can be calculated and provided.

The estimated costs per ton of the emissions controlled combine the costs of control (to be explained below) and the emission projections just described. It should be noted that costs of control are sensitive to the areal extent of the OTAG region to which controls are applied. The costs per ton shown are those applicable in the long run under steady-state conditions. For fuel programs, capital costs have been amortized over the life of the equipment. For new vehicle and engine programs, emission reductions occurring over the life of the product have been included. Emission reductions were accrued on a year-round basis, in accordance with standard convention. However, this meant that seasonal control programs required special consideration. For example, I/M reduces VOC emissions year-round from vehicles and these year-round reductions were included in the calculation of the cost per ton of VOC controlled for I/M programs. Likewise for new vehicle or engine control programs, the sum of the emission reductions over the life of the engine or vehicle (including both winter and summer operation) was used in estimating cost effectiveness. However, some fuel controls are only applied in the summer (e.g., low-RVP gasoline and the low-RVP requirements in the reformulated gasoline program), since the benefits are most valuable during the summer and refinery and fuel distribution capabilities allow for differing fuel quality between seasons. These seasonal programs could produce the same VOC or NO<sub>x</sub> emission reduction as a year-round strategy during a typical summer day, but would appear to only provide half the reduction on an annual basis. Thus, the emission reductions for seasonal programs were assumed to occur year-round to produce cost per ton estimates that were comparable to those of year-round programs.



The final column in the table indicates the consumer cost of the controls being evaluated per relevant unit. The relevant unit was either a vehicle or engine or a gallon of fuel. Where a range of costs is shown, almost always the lower limit was provided by EPA or the California Air Resources Board and the upper limit was provided by the industry group being affected. It was not possible to narrow the range of potential costs any further given the resource and time constraints involved.

The control strategies which were evaluated generally fall into four major groups. The first include in-use controls which focus on reducing emissions from sources already produced and in the field. I/M programs for motor vehicles are common examples of such control programs. A range of I/M options was evaluated, as well as enhancements and substitutes to traditional I/M, such as remote sensing and vehicle scrappage programs. In general, in-use programs are characterized by near-term start dates, quick phase-in, and near immediate achievement of full program benefits. Their emission reduction potentials range from low to high (1- 50%). It should be noted that, except for scrappage, the consumer costs shown are only those for inspection. Previous EPA analyses have estimated that the cost of repairing vehicles under enhanced programs would be more than fully compensated by reduced fuel consumption and other operational savings, while the repair costs for basic I/M programs would exceed the resultant savings to some degree. The cost effectiveness figures shown include the net repair costs and savings.

The second group of controls focuses on fuel modifications which do not require special engines or vehicles for their use, such as low-RVP and reformulated gasolines and reformulated diesel fuel. These controls require more lead time than the in-use controls, due to the need to modify refinery equipment. However, once producible, phase-in and ramp-up to full effectiveness are essentially immediate. The effectiveness of fuel-related controls range from low to moderate (1-30%). Costs vary widely (i.e., from <1-30 cents per gallon), as does cost effectiveness.

The third group of controls focuses on the design and production of cleaner engines and vehicles. Prime among these are the National (or 49-State) Low-Emission Vehicle (LEV) program for LDVs and EPA's NOx/PM 10 initiative for HDVs and large non-road engines. These programs require some lead time to develop, design and produce the emission control hardware. However, their most distinguishing feature relative to the in-use and fuel control groups is the time needed to turnover the in-use vehicle fleet to new, cleaner vehicles and engines. These programs typically require 6 - 10 years after the program start date to achieve 50% of their long-term effectiveness and 15-20 years to achieve 90% of long-term effectiveness. Because of this, their effectiveness in 2007 tends to be low to moderate, even though their long-term effectiveness would be much greater. Special note should be made of the benefits of the National LEV program. MOBILE5a only projects significant emission benefits for LEV-like vehicles when enhanced I/M is applied in the area. As indicated in the table, the benefits of the National LEV program are 2-6 times smaller without an I/M program than with enhanced I/M. This synergistic connection between National LEV and I/M is unique among all the control programs listed in the table.

The fourth and last group of controls includes alternative-fuel programs which also require special engines and vehicles for their use (e.g., the Clean Fuel Fleet Program, where natural

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gas, propane, methanol, etc. are used as fuels). These programs require significant lead time for both the design and production of the engine or vehicle, as well as the production and distribution of the fuel. Due to the absence of current infrastructure for fuel distribution, these programs would generally be limited to centrally fueled fleets or large population areas. Therefore, their overall effectiveness across the OTAG region is generally low.

A number of other control strategies not shown in these tables were also considered. However, insufficient information concerning either their cost, effectiveness, or both, was available to allow their recommendation to the OTAG Policy Group. These control strategies are described in Section 3.

## SECTION 2

# CONTROL OPTIONS FOR CONSIDERATION

### REFERENCES

1. Mobile 5a results, modeled for a hot summer day in July 2007. No I/M program, no anti-tampering program, no RFG, no LEV program. Default values for VMT mix, vehicle age distribution, annual mileage accumulation. 8.7 RVP. Av speed = 19.6 mph. VMT in cold-start = 20.6%, in hot-start = 27.3% and in hot-stabilized = 52.1. 0% ether blends, 15% alcohol blends.
2. "The Cost-Effectiveness of Further Regulating Mobile Source Emissions"; Sierra Research, Inc., and Charles River Associates; February 28, 1994.
3. U.S. Environmental Protection Agency - Office of Mobile Sources data.
4. BP Oil Company data.
5. U.S. Environmental Protection Agency - Complex Model results.
6. "Draft Discussion Paper for the Low-Emission Vehicle and Zero-Emission Vehicle Workshop on March 25, 1994"; California Environmental Protection Agency, Air Resources Board.
7. "Regulatory Impact Analysis, Clean Fuel Fleet Program"; U.S. Environmental Protection Agency; June 1994.
8. Benefits from Coordinated Research Council Fuel Studies - VE-1 & VE-10; costs from Ethyl Corporation.
9. "Regulatory Support Document, Emission Standards for Heavy-Duty Clean-Fuel Fleets"; U.S. Environmental Protection Agency; June 1994.
10. Based on data from the reg-neg on handheld and nonhandheld 0 - 25 hp gasoline-powered engines.



## SECTION 3

### OTHER CONTROL OPTIONS

As referenced at the end of the overview to this report, the committee considered a number of other mobile source control options during the development of the matrix. However, because the effectiveness or cost data was too "soft", containing an unacceptable level of uncertainty, these options were not included in the committee's recommendation to OTAG. Instead, for purposes of information and possible consideration for incorporation in a trading program or future inclusion in regional or local strategies for ozone reduction, they are listed below.

#### **Light-duty, on-highway:**

##### **Emission control upgrade**

Light-duty gasoline-powered vehicles which exhibit high emissions after remedial repairs, but which are not suitable for scrappage, would be candidates for installing upgraded emission control components. Types of emission control upgrades include: 1) installing a three-way converter with auxiliary controls on a two-way converter equipped vehicle; 2) replacing the existing three-way converter on an older, higher mileage vehicle with a current, advanced design three-way converter; 3) adding a light-off or "pre-converter"; 4) installing a hydrocarbon absorber; and 5) upgrading the evaporative emission canister.

Since the concept of emission control upgrades is in the early stages of evaluation, it is difficult to quantify the potential emission reduction benefits or the cost effectiveness. The Manufacturers of Emission Controls Association did conduct a preliminary analysis entitled "Emission Control System Upgrades for Gasoline-Powered Light-Duty Vehicles" (1995) which suggested that the emission reductions potential merited further evaluation of the upgrade concept.

##### **Advanced Technology Vehicle (ATV)**

Examples of ATVs include Ultra Low-Emission Vehicles (ULEVs), Inherently Low-Emission Vehicles (ILEVs), and Zero Emission Vehicles (ZEVs). Assuming that the National LEV is implemented, introduction of ATVs would likely occur as part of a program that shares responsibility among states, EPA, DOE, fuel providers, after-market converters, fleet operators and motor vehicle manufacturers and that is influenced by the Energy Policy Act or any other state or federal programs. The emission reduction impacts will depend largely on the development of an appropriate infrastructure and on numbers and types of ATVs sold.

##### **Fuel additives**

Fuel additives are blended into gasoline at either the refinery or at the bulk terminal to boost octane, to reduce fuel injector and intake valve deposits, or to otherwise enhance the quality and performance of the fuel. Secondly, these additives may also affect exhaust emission levels, with varying impacts on NO<sub>x</sub>, VOC, CO and toxic emissions. Research is continuing to determine the direct and indirect effects of their use.

This control could apply to heavy-duty, on-highway mobile sources as well.

### CAFE Standards

Corporate average fuel economy (CAFE) standards require the average fuel economy of new vehicle sales to meet or exceed the specified level. As such, CAFE standards reduce the amount of fuel consumed per mile driven as the fleet turns over. By reducing the amount of fuel consumed per mile, CAFE standards reduce the incremental cost of driving, which tends to encourage more driving. Thus, CAFE standards may not reduce fleet-wide fuel consumption to the degree implied by the simple change in fuel economy level.

Moreover, CAFE standards have no direct effect on NO<sub>x</sub>, HC (or VOC) and CO emissions. The standards for these pollutants apply on a per mile basis, e.g., 0.6 g/mi NO<sub>x</sub> for Tier 1 light-duty vehicles. If fuel economy increases, less fuel is burned per mile and carbon dioxide emissions will decrease, but the form of the current HC, CO, and NO<sub>x</sub> emissions standards allows the same amount of HC, CO and NO<sub>x</sub> to be emitted on a per mile basis. Reductions in HC, CO and NO<sub>x</sub> emissions would require more stringent standards for these pollutants, which is already being addressed through the National LEV program. Insofar as increased fuel economy encourages additional driving, fleet-wide HC, CO and NO<sub>x</sub> emissions may increase due to increased CAFE standards. Thus, raised CAFE standards are not recommended as an NO<sub>x</sub>, HC (VOC) or CO emission control strategy.

### Reduced VMT

Reducing vehicle miles traveled (VMT) directly reduces VOC and NO<sub>x</sub> emissions on a one-to-one basis, i.e., a 10% reduction in VMT leads to a 10% reduction in emissions. However, the emission reduction benefits and costs are highly variable for the individual control measures in this category. In addition, the measures may not be implementable in non-urban areas for various technical, economic and political reasons. Therefore, this control category is not recommended for OTAG-wide consideration. However, the committee recommends that federal, state and local air officials consider these measures for adoption in SIPs for nonattainment areas.

This control could apply to heavy-duty, on-highway mobile sources as well.

### Reduced Speed Limit

According to a recent EPA memo, issued in response to the elimination of the national highway speed limit, increasing rural highway speeds to 65 mph would increase NO<sub>x</sub> emissions by at least 5 percent. Modeling results indicate that NO<sub>x</sub> emissions may increase as much as 9 percent along portions of the I-95 corridor in the OTR. Carbon monoxide emissions are also predicted to increase because of reduced fuel economy at higher highway speed. Conversely, reducing rural speed limits should reduce NO<sub>x</sub> and CO emissions. However, this data has not been critically reviewed and is not accepted for inclusion in this report.

This control could apply to heavy-duty, on-highway mobile sources as well.



## Heavy-duty, on-highway:

### Engine Retrofit/Rebuild

The concept of diesel-powered HDE fuel conversion, emission control retrofit, and engine rebuild upgrade is not new: a great deal of experience has been gained with alternative fuel conversions; control retrofit and engine rebuild upgrade kits have been EPA certified as part of the Agency's urban bus engine retrofit/rebuild program; and a significant number of mining and industrial vehicles have been retrofitted with emission controls over the years. The NOX reduction potential of fuel conversions has been demonstrated. Until recently, however, the focus of HDE emission control retrofits and rebuild upgrade kits has been to reduce particulates, CO and/or odor. Nevertheless, development work is under way to produce integrated control retrofit/rebuild kits which reduce NOX emissions. For example, a system certified under EPA's urban bus retrofit/rebuild program uses a combined strategy of engine timing retard, internal ceramic engine coatings, and an oxidation catalyst to achieve a 40% reduction in NOX emissions, as well as a 25% reduction in particulates. It is difficult to quantify the benefits of a fuel conversion/retrofit/rebuild strategy because it is dependent on such factors as the control strategy selected and the numbers and types of engines involved.

This control could apply to non-road diesel sources as well.

## APPENDIX

# DESCRIPTIONS OF MOBILE SOURCE CONTROL TECHNOLOGIES

Selected chapters from:

Controlling Nitrogen Oxides Under the Clean Air Act: *A Menu of Options*

State and Territorial Air Pollution Program Administrators  
and Association of Local Air Pollution Control Officials, July 1994

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For the complete Appendix, see the Preliminary Report, dated January 19, 1996.

Or, see the following chapters in STAPPA/ALAPCO's Controlling Nitrogen Oxides Under the Clean Air Act: A Menu of Options :

"Motor Vehicle Inspection and Maintenance", pp. 135-141;  
"Reformulated Gasoline and Diesel Fuels", pp. 142-148;  
"California Low-Emission Vehicles", pp. 149-156;  
"Clean-Fuel Fleets", pp. 157-167;  
"Nonroad Vehicles and Engines", pp. 168-175 and  
"Accelerated Vehicle Retirement", pp. 184-188.

## OTAG Mobile Sources - Phase II Control Options

| On-AG Mobile Sources - Phase II Control Options |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
|---|------|------------------------|----------------------|-------------------------------|-----------|---|-----|---------------|------------------------------------|---------------|---------------|--|------|
| Non-road:                                       |      | Earliest<br>start date | Years to<br>phase in | Years to<br>Achieve Reduction |           | Total Non-road<br>% Reduction (Yr 2007) [6] |     |               | Estimated Cost<br>(\$ per ton) [7] |               |               | Estimated cost<br>to consumer<br>(\$ per unit) | Ref. |
| Control option                                  |      |                        |                      | 50%                           | Full      | NOx   | VOC | CO            | NOx                                | VOC           | NOx+VOC       |  |      |
| HEAVY DUTY                                      |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Clean fuels                                     |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Reform diesel                                   |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| 45 -> 53 cetane                                 | 2000 | 0                      | 0                    | 0                             | 3.4 [14]  | 0   | 0   | 3600 - 10,600 | na                                 | 3600 - 10,600 | 1.8 - 5.1 cpg | 8  |      |
| 45 -> 50 cetane                                 | 2000 | 0                      | 0                    | 0                             | 1.7       | unk   | 0   | 2200 - 5500   | na                                 | 2200 - 5500   | 0.8 - 1.9 cpg | 4  |      |
| 50 -> 55 cetane                                 | 2000 | 0                      | 0                    | 0                             | 1.1       | unk   | 0   | 8000 - 23,000 | na                                 | 8000 - 23,000 | 1.8 - 5.3 cpg | 4  |      |
| Low NOx fuels [12]                              | 1998 | 0                      | 0                    | 0                             | 11 [*,14] | 0   | unk | 39,600 [*]    | na                                 | 39,600 [*]    | 1.40/gal      | 3  |      |
| NOx/PM initiative [15]                          |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| 6.9 -> 5.2 g/hp-hr                              | 2004 | 1                      | 7                    | 20                            | 3.4       | 0   | na  | 119           | na                                 | 119           | 133/eng       | 3  |      |
| 6.9 -> 4.0 g/hp-hr                              | 2002 | 3                      | 8                    | 22                            | 7.9       | 0   | na  | 177           | na                                 | 177           | 226/eng       | 3  |      |
| OTHER   |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Sm gasoline engines                             |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Phase II (30/25)                                |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Handheld  | 2002 | 4                      | 3                    | 7                             | -0.3      | 9.6   | na  | na            | na                                 | 5300          | var           | 10   |      |
| Non-handheld                                    | 2002 | 0                      | 3                    | 7                             | -0.3      | 17.1  | na  | na            | na                                 | 53            | var           | 10   |      |
| CARB certified                                  |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Handheld  | 1999 | 0                      | 1                    | 3                             | -0.3      | 22.9  | na  | na            | na                                 | > 5300        | unk           | 10   |      |
| Non-handheld                                    | 1999 | 0                      | 3                    | 7                             | -0.3      | 22.9  | na  | na            | na                                 | > 8000        | unk           | 10   |      |
| CARB (in-use + evap)                            |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| Handheld  | 1999 | 0                      | 1                    | 3                             | -0.3      | 22.9  | na  | na            | na                                 | > 5300        | unk           | 10   |      |
| Non-handheld                                    | 1999 | 0                      | 3                    | 7                             | -0.3      | 22.9  | na  | na            | na                                 | > 8000        | unk           | 10   |      |
| Recreational marine [16]                        |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| New av std                                      | 1998 | 9                      | 13                   | 40                            | 0.4       | 10.8  | na  | na            | 700                                | 700           | var           | 3  |      |
| Locomotives [17]                                |      |                        |                      |                               |           |   |     |               |                                    |               |               |  |      |
| New av std                                      | 2000 | 5                      | 3                    | 30                            | 7.7 [18]  | negl  | unk | 840 [18]      | na                                 | 840 [18]      | \$280K - 440K | 3  |      |

## Notes:

- [\*] - Estimate based on very limited information and subject to a high level of uncertainty.
- [6] - The base for these reductions is all non-road mobile sources in a typical attainment area, without any Phase I control measures.
- [7] - Average cost (not marginal).
- [12] - Applicability may be limited because of low availability.
- [14] - Fuel must be used in marine, locomotive, and all other diesel engines to gain full benefits.
- [15] - EPA is seeking an agreement or rule to limit NOx and PM from non-road engines, excluding recreation, lawn/garden, marine, locomotive, aircraft.
- [16] - Proposed rule applies average emission standard, offering manufacturers flexibility in producing cleaner engines.
- [17] - Proposed rule seeks to reduce NOx and PM. Also, encourages retrofitting for accelerated reduction benefits.
- [18] - Calculated benefits and costs include rebuild.

| Heavy-duty, on-hwy:       |      | Earliest start date | Years to phase in | Years to Achieve Reduction |         | Total (LD+HD) On-Highway % Reduction (Yr 2007) [7] |          |                 | Estimated Cost (\$ per ton) [8] |                |                | Estimated cost to consumer (\$ per unit) | F |
|---------------------------|------|---------------------|-------------------|----------------------------|---------|--|----------|-----------------|---------------------------------|----------------|----------------|--|---|
| Control option            |      |                     |                   | 50%                        | Full    | NOx  | VOC      | CO              | NOx                             | VOC            | NOx+VOC        |  |   |
| In use (gasoline-powered) |      |                     |                   |                            |         |  |          |                 |                                 |                |                |  |   |
| I/M                       | 2000 | 4                   | 2                 | 4                          | 0.8     | 1.7  | 0.7      | 2500 [*]        | 1000 [*]                        | 700 [*]        | 10/veh/yr      | 1  |   |
| Remote sensing            | 2000 | 2                   | 2                 | 4                          | 0.2 [*] | 0.4 [*]  | 0.2 [*]  | 2500 [*]        | 1000 [*]                        | 700 [*]        | 51/veh/yr [10] | 1  |   |
| OBD                       | 2002 | 0                   | 10                | 20                         | 0.3     | 0.2  | 0.1      | 1000 [*]        | 1000 [*]                        | 500 [*]        | 5/veh/yr       | 1  |   |
| Clean fuels               |      |                     |                   |                            |         |  |          |                 |                                 |                |                |  |   |
| Reform diesel             |      |                     |                   |                            |         |  |          |                 |                                 |                |                |  |   |
| 45 -> 53 cetane           | 2000 | 0                   | 0                 | 0                          | 1.2     | 0  | negl     | 6900 - 19,500   | na                              | 6900 - 19,500  | 1.8 - 5.1 cpg  | 8  |   |
| 45 -> 50 cetane           | 2000 | 0                   | 0                 | 0                          | 0.7     | 1.8  | 1.0      | 3500 - 8300     | 1100 - 2700                     | 840 - 2000     | 0.8 - 1.9 cpg  | 4  |   |
| 50 -> 55 cetane           | 2000 | 0                   | 0                 | 0                          | 0.4     | 1.0  | 0.6      | 13,500 - 40,000 | 4700 - 13,500                   | 3500 - 10,000  | 1.8 - 5.3 cpg  | 4  |   |
| Biodiesel blend (B20)     | 2000 | 0                   | 0                 | 0                          | 0.02    | unk  | unk      | 6,000,000       | na                              | 6,000,000      | 39 cpg         | 4  |   |
| Low NOx fuels [12]        | 1998 | 0                   | 0                 | 0                          | 2.5 [*] | 0  | unk      | 170,000 [*]     | na                              | 170,000 [*]    | 1.40/gal       | 3  |   |
| Clean fuel fleets         | 1998 | 3                   | 3                 | 10                         | 2.2     | 0.1  | = Tier 1 | 2900            | 11,400                          | 2300           | 515/veh        | 1,                                       |   |
| NOx initiative [13]       |      |                     |                   |                            |         |  |          |                 |                                 |                |                |  |   |
| 3 g/hp-hr std             | 2004 | 0                   | 9                 | 30                         | 2.8     | negl   | na       | 400 - 1000 [*]  | na                              | 400 - 1000 [*] | 200 - 700/eng  | 1,                                       |   |
| 2 g/hp-hr std             | 2004 | 0                   | 9                 | 30                         | 5.6     | negl   | na       | 200 - 500 [*]   | na                              | 200 - 500 [*]  | 200 - 700/eng  | 1,                                       |   |

## Notes:

[\*] - Estimate based on very limited information and subject to a high level of uncertainty.

[7] - The base for these reductions is all highway vehicles in a typical attainment area, without any Phase I in-use, clean fuels or other control measures.

[8] - Average cost (not marginal).

[10] - Field costs for testing 20% of the fleet, plus cost of high enhanced I/M support.

[12] - Applicability may be limited because of low availability.

[13] - Proposed rule to reduce allowed emission rate is due. Based on agreement between HD engine manufacturers, EPA and State of California



## OTAG Mobile Sources - Phase II Control Options

04/11/96

| Light-duty, on-hwy:  |                     | Years to          |             | Total (LD+HD) On-Highway |                           |           | Estimated Cost |    |                  | Estimated cost   |                           | Ref                 |     |
|----------------------|---------------------|-------------------|-------------|--------------------------|---------------------------|-----------|----------------|----|------------------|------------------|---------------------------|---------------------|-----|
| Control option       | Earliest start date | Years to phase in | Achieve 50% | Reduction Full           | % Reduction (Yr 2007) [6] | NOx       | VOC            | CO | (\$ per ton) [7] | NOx+VOC          | to consumer (\$ per unit) |                     |     |
| Non-FTP rule [1]     | 1998                | 3                 | 7           | 15 - 25                  | 2.4 - 5.8                 | 1.5 - 2.7 | yes            |    | 850 - 30,000     | 2100 - 55,000    | 600 - 19,000              | 10 - 145/veh        | 3   |
| In use               |                     |                   |             |                          |                           |           |                |    |                  |                  |                           |                     |     |
| I/M                  |                     |                   |             |                          |                           |           |                |    |                  |                  |                           |                     |     |
| Basic                | 2000                | 2                 | 1           | 4                        | 0.6                       | 7.0       | 10.0           |    | 40,000 - 95,000  | 3800 - 9000      | 3500 - 8200               | 8 - 18/veh/yr [8]   | 1   |
| Basic NOx [2]        | 2000                | 4                 | 2           | 4                        | 14.0                      | 15.0      | 26.0           |    | 1100             | 1000             | 550                       | 7/veh/yr            | 1   |
| Low enhanced         | 2000                | 4                 | 2           | 4                        | 1.0                       | 9.0       | 14.0           |    | 32,000 - 75,000  | 3000 - 7000      | 2800 - 6500               | 8-18/veh/yr [8]     | 1   |
| High enhanced        | 2000                | 4                 | 2           | 4                        | 17.0                      | 41.0      | 38.0           |    | 2200             | 900 - 3200       | 650 - 2400                | 10 - 22/veh/yr      | 1,2 |
| Maximum [3]          | 2000                | 3 - 4             | 1           | 3 - 4                    | 21.0                      | 50.0      | 48.0           |    | 3300             | 1400             | 1000                      | 19/veh/yr           | 1   |
| Remote sensing       | 2000                | 2                 | 2           | 4                        | 4 [*]                     | 10 [*]    | 10 [*]         |    | 2500 [*]         | 1000 [*]         | 700 [*]                   | 51/veh/yr [9]       | 1   |
| Scrappage            | 1999                | 1                 | 2 [*]       | 4 [*]                    | <1 [*]                    | <1 [*]    | 2 [*]          |    | var              | 26,000 [10]      | 18,000 [10]               | 500 -2000/veh       | 1,2 |
| Clean fuels          |                     |                   |             |                          |                           |           |                |    |                  |                  |                           |                     |     |
| Low RVP              |                     |                   |             |                          |                           |           |                |    |                  |                  |                           |                     |     |
| 9.0 -> 7.1 psi       | 2002                | 0                 | 0           | 0                        | 0 - 0.4                   | 16.9      | 3.0            |    | 16,000 - ?       | 320 - 1400       | 320 - 1400                | 0.36 - 1.6 cpg [11] | 1,3 |
| 9.0 -> 6.7 psi       | 2002                | 0                 | 0           | 0                        | 0 - 0.5                   | 21.0      | 3.0            |    | 15,000 - ?       | 300 - 1600       | 300 - 1600                | 0.42 - 2.2 cpg [11] | 1,3 |
| 9.0 -> 7.8 psi       | 2000                | 0                 | 0           | 0                        | 0 - 0.3                   | 10.0      | 3.0            |    | 12,000 - ?       | 300 - 760        | 300 - 760                 | 0.20 - 0.5 cpg [11] | 1,3 |
| 7.8 -> 7.0 psi [4]   | 2002                | 0                 | 0           | 0                        | 0 - 0.2                   | 8.0       | 0              |    | 15,000 - ?       | 300 - 2300       | 300 - 2300                | 0.16 - 1.2 cpg [11] | 1,3 |
| Low sulfur (150 ppm) | 2004                | 0                 | 0           | 0                        | 4.4                       | 2.2 - 5.3 | 3.3 - 8.0      |    | 4100 - 12,000    | 2900 - 21,000    | 1700 - 7700               | 1.0 - 3.0 cpg [11]  | 3,4 |
| Fed RFG - Phase I    | 2004                | 0                 | 0           | 0                        | 1.1 - 2.2                 | 13.4      | 17.1           |    | 43,000 - 120,000 | 5900 - 8200      | 5200 - 7700               | 5.2 - 7.3 cpg [12]  | 3,4 |
| - Phase II           | 2004                | 0                 | 0           | 0                        | 4.8                       | 25.2      | 17.1           |    | 25,000 - 45,000  | 4000 - 7100      | 3500 - 6200               | 6.7-11.9 cpg [12]   | 3,4 |
| CA Phase II          | 2004                | 0                 | 0           | 0                        | 7.8 - 10.0                | 26.9      | 17.1           |    | 30,000 - 60,000  | 9300 - 15,000    | 7100 - 12,000             | 16.5 - 26 cpg [13]  | 3,4 |
| Clean fueled fleets  | 1998                | 3                 | 3           | 10                       | 0.70                      | 0.42      | 0.74           |    | 56,000 - 260,000 | 36,000 - 165,000 | 22,000 - 100,000          | 180 - 844/veh       | 1,2 |
| National LEV         |                     |                   |             |                          |                           |           |                |    |                  |                  |                           |                     |     |
| w/o I/M              | 2001                | 0 - 4             | 6 - 7       | 14 - 15                  | 3.0 - 3.7                 | 2.5 - 3.0 | 4.0 - 6.0      |    | 11,000 - 56,000  | 11,900 - 60,000  | 5800 - 29,000             | 114 - 576/veh       | 1,2 |
| w/LEV-only I/M [5]   | 2001                | 0                 | 6           | 14                       | 14                        | 16        | 19             |    | 3100 - 8900      | 2000 - 5800      | 1200 - 3400               | + 7/veh/yr          | 1,2 |
| w/OBD check only     | 2001                | 0                 | 10          | 20                       | 5 [*]                     | 9 [*]     | 10 [*]         |    | unk              | unk              | unk                       | unk                 | 1   |

## Notes:

- [\*] - Estimate based on very limited information and subject to a high level of uncertainty.
- [1] - Expected control through rulemaking process as part of Phase I; NPRM published 1995.
- [2] - "Basic NOx" includes IM240 testing on vehicles 6 to 16 years old. NOx cutpoints are EPA high-enhanced standard. HC & CO are lenient. No evap.
- [3] - "Maximum" is annual IM240 with cutpoints at 75% of EPA high-enhanced standard. Evap & purge also.
- [4] - Incremental effectiveness and cost.
- [5] - "LEV-only I/M" includes additional requirements as specified in EPA guidance. Also includes evap benefits.
- [6] - The base for these reductions is all highway vehicles in a typical attainment area, without any Phase I in-use, clean fuels or other control measures.
- [7] - Average cost (not marginal).
- [8] - \$8 for annual test-only program and \$18 for annual test-and-repair program.
- [9] - Field costs for testing 20% of the fleet, plus cost of high enhanced I/M support.
- [10] - Estimate based on \$700/veh California program.
- [11] - Annualized costs for summertime program.
- [12] - Lower limit may be at least 0.4 cents lower, based on ARCO Chemical's estimate of the future cost of oxygenates, and refinery costs if application is less than OTAG-wide.
- [13] - Lower limit may be significantly lower based on market price for California.



Control Technologies and Options Workgroup

**ASSESSMENT OF CONTROL TECHNOLOGIES FOR REDUCING  
NITROGEN OXIDE EMISSIONS FROM NON-UTILITY  
POINT SOURCES AND MAJOR AREA SOURCES**

**I. Introduction**

This document provides a brief overview of NO<sub>x</sub> control technologies for non-utility fossil-fuel fired boilers, other stationary sources of NO<sub>x</sub>, and major area sources. The information presented is drawn from presentations made to the OTAG Control Technologies Workgroup, from documents provided by affected industries, and from knowledgeable sources such as USEPA and STAPPA/ALAPCO.

As is stated in the companion document on NO<sub>x</sub> emission reduction technologies for electric utilities, the objective of this report is to provide a brief review of currently available technology options for the sources indicated. There is no single preferred technology, nor does this report prioritize or rank the technologies discussed according to effectiveness or preference. Some technologies may have multiple applications, while others may be limited in their utility. This workgroup has attempted insofar as possible to avoid making choices which would lead to a limitation of policy options.

**II. Universe of Sources**

Prior to a discussion of available control technologies, it would be helpful to describe the universe of sources being considered. These range from large non-utility boilers used by major industries to chemical manufacturing and metals processing, and from pulp and paper mills to waste disposal through incineration. Of these sources, fossil fuel combustion accounts for approximately 75% of the total NO<sub>x</sub> emissions. A list of the general source categories is shown on Page 6. This report covers the first nine categories, accounting for nearly 87% of all non-utility point source and area source NO<sub>x</sub> emissions. The remaining categories were not considered due to their relatively small contributions, the nature of the particular sources, and the limited amount of time available to the workgroup.

Pages 7-8 provide a more detailed assessment of the character of both the universe of sources and the nature of the NO<sub>x</sub> emissions. As can be seen, most of these sources make relatively small contributions. It must also be remembered that, unlike utilities, this is a disparate group of sources, some of which are currently regulated, some of which will be regulated in the near future, and some of which are not regulated at all. Thus the potential for reductions varies not only with their relative contribution but with the potential for control as well.



### III. Control Technologies

This section presents a brief description of the control technologies available for each category of sources. Information for this discussion, as noted above, was provided by industry representatives, USEPA, STAPPA/ALAPCO, and others.

#### A. Non-Utility Boilers

The technologies for controlling emissions from non-utility boilers is largely identical to that for utility boilers. The reader is referred to the discussion of utility boiler controls in "Electric Utility Nitrogen Oxides Reduction Technology Options" also prepared by this workgroup.

#### B. Reciprocating Internal Combustion Engines

Several strategies are available for controlling NOx emissions from reciprocating engines. Air/fuel ratio adjustment, low emission combustion, and pre-stratified charge all function by modifying the combustion zone air/fuel ratio, in turn influencing oxygen availability and peak flame temperature. Ignition timing adjustment lowers the peak flame temperature by delaying the onset of combustion. SCR and SNCR alter the chemical properties of NOx after its formation. Finally, some companies have developed "low-NOx fuels," which reduce NOx emissions by adjusting inputs. Further information on each of these technologies may be found in "Controlling Nitrogen Oxides Under the Clean Air Act: A Menu of Options," prepared by STAPPA/ALAPCO.

#### C. Gas Turbines

Controlling NOx emissions from gas turbines may be accomplished through water or steam injection into the combustion chamber, lowering peak temperatures and reducing the formation of thermal NOx; lean pre-mixed combustion, which reduces flame temperatures by injecting excess air; and SCR. Further information on each of these technologies may be found in "Alternative Control Techniques Document--NOx Emissions from Stationary Gas Turbines," published by USEPA.

#### D. Residential Fuel Combustion

During ozone season, residential fuel combustion is used to produce hot water and to operate air conditioning units. Typical fuels are electricity and natural gas.

Reducing electrical demand, and therefore utility emissions, may be accomplished through replacement of existing units with units of higher efficiency, with improved insulation and other external improvements, and with partial or full solar units, when feasible. Reducing NOx emissions from natural gas units is generally accomplished through replacement with units of higher efficiency or low-NOx burners, along with solar-assisted water heating.

The South Coast Air Quality Management District has developed regulations for controlling NOx emissions from residential fuel combustion.



## E. Cement Manufacturing

Cement kilns are similar in concept to boilers in that they use a fossil fuel to create very high temperatures which chemically alter the raw materials. Almost all of the NO<sub>x</sub> emissions from cement kilns are the result of fuel combustion.

Controlling NO<sub>x</sub> emissions from cements kilns is accomplished through combustion controls, such as flame control, changes in fuel input parameters, preheating the raw material inputs, and the use of additives. According to USEPA, SNCR may be applicable to some types of kilns as well, although some increases in ammonia emissions may occur as a result. SCR may also be used. Further information on these technologies may be found in "Controlling Nitrogen Oxides" from STAPPA/ALAPCO, and in the ACT document "Control of NO<sub>x</sub> Emissions from Cement Manufacturing" from USEPA.

## F. Ferrous Metals Processing

Although the production of iron and steel finished products is a fairly complex process, the vast majority of NO<sub>x</sub> emissions come from the use of fossil fuels to heat the furnaces in which the ores are reduced and separated. Emission reduction technologies include low-NO<sub>x</sub> burners, flue gas recirculation, SCR and SNCR. Typically, low-NO<sub>x</sub> burners are used in combination with flue gas recirculation in reheating furnaces, and with SCR or SNCR in annealing furnaces. The USEPA has developed an ACT document entitled "NO<sub>x</sub> Emissions from Iron and Steel Mills." Further information on control technologies may also be obtained from STAPPA's NO<sub>x</sub> control handbook.

## G. Wood, Pulp, and Paper Manufacturing

Wood, pulp, and paper manufacturing involves three basic processes. Industrial boilers are used to produce steam and power, and are fueled by fossil fuels and/or wood waste products. Recovery boilers evaporate water from the effluents and reduce the remaining chemicals and waste products to a form appropriate for recycling. Lime kilns are used to recover the calcium oxide used in treating the effluents in the recovery boilers.

NO<sub>x</sub> emissions reductions from the industrial boilers may be reduced using the same techniques described in the section on utility boilers. Emissions from lime kilns may be reduced in the same manner as those described for cement kilns.

Emissions from recovery boilers are generally not thermally produced, and are therefore not sensitive to reductions in flame temperature. Changes in the process, including low excess air and air staging, may reduce NO<sub>x</sub> emissions somewhat. SNCR may also be used as a post-process reduction technique.

## H. Agricultural Chemicals

The production of agricultural chemicals, chiefly ammonia and nitric acids used for fertilizer, is largely uncontrolled with respect to NOx emissions. Ammonia production utilizes a high-temperature boiler to produce steam, from which the hydrogen is stripped. It is later mixed with nitrogen, purified, and dried, producing ammonia. Controlling NOx emissions from the boiler may be accomplished as described in previous sections.

Nitric acid is produced by a three-step process: 1) combining oxygen and ammonia to produce nitric oxide; 2) mixing nitric oxide with air to produce nitrogen dioxide; and 3) absorption of the nitrogen dioxide in water to produce "weak" nitric acid. NOx emissions are produced at the end of the process, as waste gases are vented. Generally, these gases are run through an absorber tower. Reducing emissions can be accomplished by extending the absorption time, either by increasing the height of the tower or by adding a second tower in series with the first. SCR and non-selective catalytic reduction (NSCR) may also be used, although NSCR requires an additional fuel and catalyst. The USEPA has published an ACT document for nitric acid production. Further information on reducing NOx emissions from ammonia and nitric acid production may be obtained from the STAPPA handbook on NOx control.

## I. Oil and Gas Production

NOx emissions from oil and gas production come from refineries, which use process heaters, boilers, catalytic cracking units, and tail gas incinerators. NOx control techniques for process heaters and boilers have been described above. NOx emissions from the catalytic cracking units may be reduced through process changes, such as minimizing excess air in the flue gas or changing the input mix. NOx emissions from tail gas incinerators may be reduced with SNCR or low-NOx burners. Further information may be obtained from the STAPPA handbook on NOx control.

## J. Waste Incineration

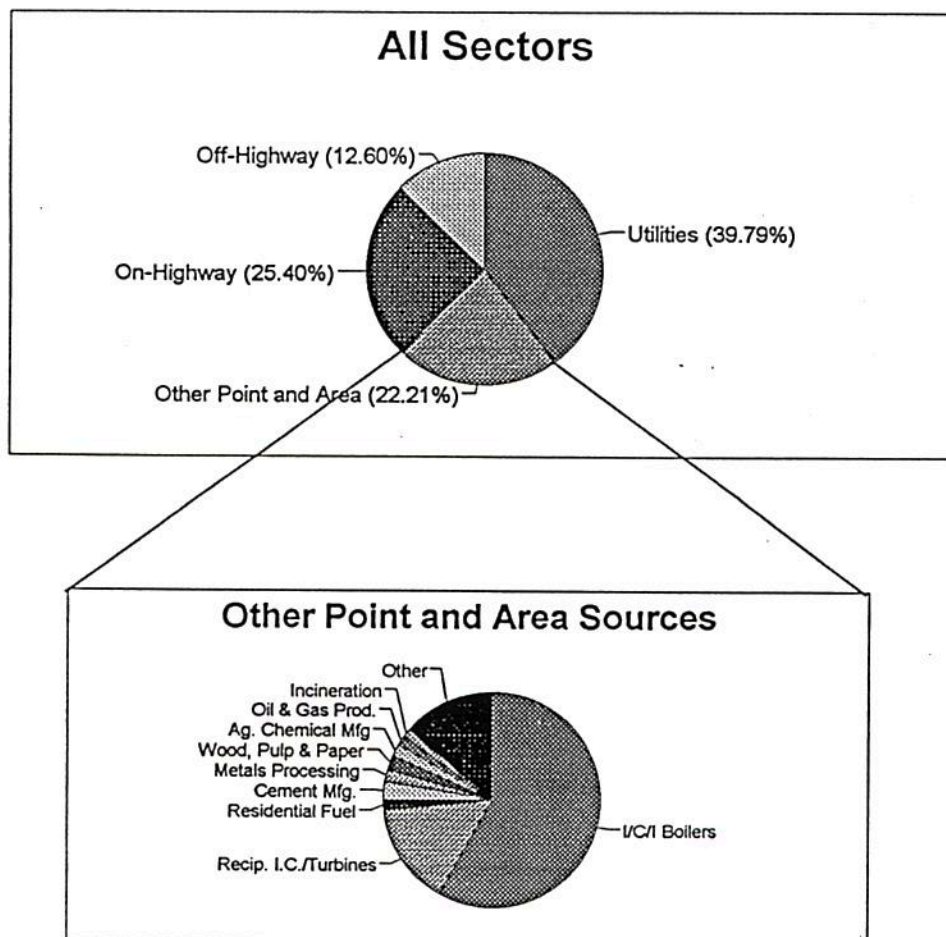
Waste incineration includes municipal, medical, hazardous, and sewage sludge incineration. NOx emission controls include process changes, such as low excess air, staged combustion, flue gas recirculation, and gas reburning; as well as post-process controls (SCR and SNCR).

Municipal and medical waste incinerators are the subject of recent USEPA rulemaking, and emissions from these sources will be reduced in the near future. Further information may be obtained from the USEPA.

Attachment

## NOx Sector Contribution - preliminary 1990 OTAG Inventory

| ALL SECTORS          |                 |                |
|----------------------|-----------------|----------------|
| Source Category      | NOx<br>(tpd)    | % of Total     |
| Utilities            | 20387.81        | 39.79%         |
| Other Point and Area | 11377.96        | 22.21%         |
| On-Highway           | 13013.24        | 25.40%         |
| Off-Highway          | 6455.89         | 12.60%         |
| <b>TOTAL =</b>       | <b>51234.90</b> | <b>100.00%</b> |





**Prioritized Contribution of NOx Source Categories, from EPA's Tier 3 Summary**  
**Dated December 1995**

| General Source Category           | Specific Source Category                  | TPD     | Cum. %  |
|-----------------------------------|---|---------|---------|
| 1 FUEL COMB.                      | I/C Boilers                               | 6601.30 | 58.02%  |
| 2 FUEL COMB.                      | Recip. I.C. Engines/Gas Turbines          | 1738.33 | 73.30%  |
| 3 FUEL COMB.                      | Fuel Comb. - Residential                  | 192.39  | 74.99%  |
| 4 OTHER INDUSTRIAL PROCESSES      | Mineral Products - cement mfg.            | 294.47  | 77.58%  |
| 5 METALS PROCESSING               | Ferrous                                   | 225.50  | 79.56%  |
| 6 OTHER INDUSTRIAL PROCESSES      | Wood, Pulp & Paper, & Publishing Products | 235.35  | 81.63%  |
| 7 CHEMICAL & ALLIED PRODUCT MFG   | Agricultural Chemical Mfg                 | 205.51  | 83.43%  |
| 8 PETROLEUM & RELATED INDUSTRIES  | Oil & Gas Production                      | 164.52  | 84.88%  |
| 9 WASTE DISPOSAL & RECYCLING      | Incineration                              | 148.27  | 86.18%  |
| 10 OTHER INDUSTRIAL PROCESSES     | Agriculture, Food, & Kindred Products     | 143.43  | 87.44%  |
| 11 SOLVENT UTILIZATION            | Surface Coating                           | 122.21  | 88.52%  |
| 12 OTHER INDUSTRIAL PROCESSES     | Mineral Products - glass mfg.             | 118.34  | 89.56%  |
| 13 MISCELLANEOUS                  | Other Combustion                          | 115.68  | 90.57%  |
| 14 PETROLEUM & RELATED INDUSTRIES | Petroleum Refineries & Related Industries | 112.89  | 91.56%  |
| 15 WASTE DISPOSAL & RECYCLING     | Open Burning                              | 67.64   | 92.16%  |
| 16 CHEMICAL & ALLIED PRODUCT MFG  | Organic Chemical Mfg                      | 63.20   | 92.71%  |
| 17 STORAGE & TRANSPORT            | Organic Chemical Storage and Transport    | 55.29   | 93.20%  |
| 18 WASTE DISPOSAL & RECYCLING     | POTW                                      | 33.71   | 93.50%  |
| 19 CHEMICAL & ALLIED PRODUCT MFG  | Inorganic Chemical Mfg                    | 33.58   | 93.79%  |
| 20 STORAGE & TRANSPORT            | Inorganic Chemical Storage                | 30.90   | 94.06%  |
| 21 METALS PROCESSING              | Non-Ferrous Metals Processing             | 26.63   | 94.30%  |
| 22 WASTE DISPOSAL & RECYCLING     | Other                                     | 23.26   | 94.50%  |
| 23 CHEMICAL & ALLIED PRODUCT MFG  | Polymer & Resin Mfg                       | 22.06   | 94.70%  |
| 24 SOLVENT UTILIZATION            | Graphic Arts                              | 20.71   | 94.88%  |
| 25 OTHER INDUSTRIAL PROCESSES     | Miscellaneous Industrial Processes        | 18.71   | 95.04%  |
| 26 PETROLEUM & RELATED INDUSTRIES | Asphalt Manufacturing                     | 18.52   | 95.20%  |
| 27 METALS PROCESSING              | Metals Processing NEC                     | 17.59   | 95.36%  |
| 28 WASTE DISPOSAL & RECYCLING     | Landfills                                 | 17.38   | 95.51%  |
| 29 STORAGE & TRANSPORT            | Pet. & Pet. Prod. Storage and Transport   | 15.41   | 95.65%  |
| 30 OTHER INDUSTRIAL PROCESSES     | Rubber & Miscellaneous Plastic Products   | 15.33   | 95.78%  |
| 31 OTHER INDUSTRIAL PROCESSES     | Machinery Products                        | 11.66   | 95.88%  |
| 32 STORAGE & TRANSPORT            | Bulk Terminals & Plants                   | 11.01   | 95.98%  |
| 33 OTHER INDUSTRIAL PROCESSES     | Textiles, Leather, & Apparel Products     | 10.05   | 96.07%  |
| 34 CHEMICAL & ALLIED PRODUCT MFG  | Paint, Varnish, Lacquer, Enamel Mfg       | 6.13    | 96.12%  |
| 35 CHEMICAL & ALLIED PRODUCT MFG  | Pharmaceutical Mfg                        | 1.27    | 96.13%  |
| 36 OTHER INDUSTRIAL PROCESSES     | Transportation Equipment                  | 0.96    | 96.14%  |
| 37 SOLVENT UTILIZATION            | Degreasing                                | 0.84    | 96.15%  |
| 38 SOLVENT UTILIZATION            | Other Industrial                          | 0.27    | 96.15%  |
| 39 OTHER INDUSTRIAL PROCESSES     | Mineral Products - misc.                  | 222.26  | 98.11%  |
| 40 OTHER INDUSTRIAL PROCESSES     | Electronic Equipment                      | 0.12    | 98.11%  |
| 41 CHEMICAL & ALLIED PRODUCT MFG  | Other Chemical Mfg                        | 215.29  | 100.00% |
| 42 SOLVENT UTILIZATION            | Dry Cleaning                              | 0.02    | 100.00% |
| 43 STORAGE & TRANSPORT            | Service Stations: Stage I and II          | 0.00    | 100.00% |
| 44 STORAGE & TRANSPORT            | Bulk Materials Storage                    | 0.00    | 100.00% |
| 45 WASTE DISPOSAL & RECYCLING     | TSDf                                      | 0.00    | 100.00% |

TOTAL 11377.96

\* These categories represent numerous sub-categories too small and diverse to warrant individual attention, and are therefore taken out of contention for consideration.



# Background - EPA Preliminary Tier 3 Summary of NOx Emissions in Tons/Summer Day

Dated December 1995

| TIER1 | TIER2 | TIER | TIER1NAME                     | TIER2NAME                                 | TIER3NAME            | POINT    | AREA    | TOTAL    | ref |
|-------|-------|------|-------------------------------|---|----------------------|----------|---------|----------|-----|
| 01    | 01    | 01   | FUEL COMB. ELEC. UTIL.        | Coal                                      | bituminous           | 14043.30 | 0.00    | 14043.30 | 1   |
| 01    | 01    | 02   | FUEL COMB. ELEC. UTIL.        | Coal                                      | subbituminous        | 2085.46  | 0.00    | 2085.46  | 1   |
| 01    | 01    | 03   | FUEL COMB. ELEC. UTIL.        | Coal                                      | anthracite & lignite | 858.83   | 0.00    | 858.83   | 1   |
| 01    | 01    | 99   | FUEL COMB. ELEC. UTIL.        | Coal                                      |                      |          | 5.16    | 5.16     | 1   |
| 01    | 02    | 01   | FUEL COMB. ELEC. UTIL.        | Oil                                       | residual             | 1085.37  | 0.00    | 1085.37  | 1   |
| 01    | 02    | 02   | FUEL COMB. ELEC. UTIL.        | Oil                                       | distillate           | 277.46   | 0.42    | 277.88   | 1   |
| 01    | 03    | 01   | FUEL COMB. ELEC. UTIL.        | Gas                                       | natural              | 1162.13  | 0.39    | 1162.52  | 1   |
| 01    | 03    | 02   | FUEL COMB. ELEC. UTIL.        | Gas                                       | process              | 30.78    | 0.00    | 30.78    | 1   |
| 01    | 04    | 99   | FUEL COMB. ELEC. UTIL.        | Other                                     |                      | 56.97    | 0.00    | 56.97    | 1   |
| 01    | 05    | 99   | FUEL COMB. ELEC. UTIL.        | Internal Combustion                       |                      | 769.23   | 12.31   | 781.54   | 1   |
| 02    | 01    | 01   | FUEL COMB. INDUSTRIAL         | Coal                                      | bituminous           | 1086.48  | 0.00    | 1086.48  | 2   |
| 02    | 01    | 02   | FUEL COMB. INDUSTRIAL         | Coal                                      | subbituminous        | 12.38    | 0.00    | 12.38    | 2   |
| 02    | 01    | 03   | FUEL COMB. INDUSTRIAL         | Coal                                      | anthracite & lignite | 60.18    | 0.84    | 61.02    | 2   |
| 02    | 01    | 99   | FUEL COMB. INDUSTRIAL         | Coal                                      |                      |          | 421.76  | 421.76   | 2   |
| 02    | 02    | 01   | FUEL COMB. INDUSTRIAL         | Oil                                       | residual             | 298.90   | 156.01  | 454.91   | 2   |
| 02    | 02    | 02   | FUEL COMB. INDUSTRIAL         | Oil                                       | distillate           | 59.18    | 110.98  | 170.16   | 2   |
| 02    | 02    | 99   | FUEL COMB. INDUSTRIAL         | Oil                                       |                      | 39.10    | 0.00    | 39.10    | 2   |
| 02    | 03    | 01   | FUEL COMB. INDUSTRIAL         | Gas                                       | natural              | 1458.60  | 1430.87 | 2889.47  | 2   |
| 02    | 03    | 02   | FUEL COMB. INDUSTRIAL         | Gas                                       | process              | 544.92   | 0.09    | 545.01   | 2   |
| 02    | 03    | 99   | FUEL COMB. INDUSTRIAL         | Gas                                       |                      | 20.30    | 0.00    | 20.30    | 2   |
| 02    | 04    | 01   | FUEL COMB. INDUSTRIAL         | Other                                     | wood/bark waste      | 156.90   | 4.06    | 160.96   | 2   |
| 02    | 04    | 02   | FUEL COMB. INDUSTRIAL         | Other                                     | liquid waste         | 22.46    | 0.00    | 22.46    | 2   |
| 02    | 04    | 99   | FUEL COMB. INDUSTRIAL         | Other                                     |                      | 60.70    | 12.93   | 73.63    | 2   |
| 03    | 01    | 99   | FUEL COMB. OTHER              | Commercial/Institutional Coal             |                      | 57.32    | 16.23   | 73.54    | 2   |
| 3     | 02    | 99   | FUEL COMB. OTHER              | Commercial/Institutional Oil              |                      | 47.67    | 113.19  | 160.86   | 2   |
| J3    | 03    | 99   | FUEL COMB. OTHER              | Commercial/Institutional Gas              |                      | 174.16   | 176.79  | 350.95   | 2   |
| 03    | 04    | 99   | FUEL COMB. OTHER              | Misc. Fuel Comb. (Except Residential)     |                      | 39.78    | 18.54   | 58.32    | 2   |
| 02    | 05    | 99   | FUEL COMB. INDUSTRIAL         | Internal Combustion                       |                      | 1736.91  | 1.41    | 1738.33  | 3   |
| 03    | 05    | 99   | FUEL COMB. OTHER              | Residential Wood                          |                      |          | 5.20    | 5.20     | 4   |
| 03    | 06    | 01   | FUEL COMB. OTHER              | Residential Other                         | distillate oil       |          | 49.96   | 49.96    | 4   |
| 03    | 06    | 02   | FUEL COMB. OTHER              | Residential Other                         | natural gas          |          | 102.10  | 102.10   | 4   |
| 03    | 06    | 99   | FUEL COMB. OTHER              | Residential Other                         |                      |          | 35.13   | 35.13    | 4   |
| 04    | 01    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Organic Chemical Mfg                      |                      | 63.13    | 0.07    | 63.20    | 5   |
| 04    | 02    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Inorganic Chemical Mfg                    |                      | 33.58    | 0.00    | 33.58    | 6   |
| 04    | 03    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Polymer & Resin Mfg                       |                      | 22.06    | 0.00    | 22.06    | 7   |
| 04    | 04    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Agricultural Chemical Mfg                 |                      | 205.51   | 0.00    | 205.51   | 8   |
| 04    | 05    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Paint, Varnish, Lacquer, Enamel Mfg       |                      | 6.13     | 0.00    | 6.13     | 9   |
| 04    | 06    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Pharmaceutical Mfg                        |                      | 1.27     | 0.00    | 1.27     | 10  |
| 04    | 07    | 99   | CHEMICAL & ALLIED PRODUCT MFG | Other Chemical Mfg                        |                      | 215.29   | 0.00    | 215.29   | 11  |
| 05    | 01    | 99   | METALS PROCESSING             | Non-Ferrous Metals Processing             |                      | 26.25    | 0.38    | 26.63    | 12a |
| 05    | 02    | 99   | METALS PROCESSING             | Ferrous Metals Processing                 |                      | 225.41   | 0.09    | 225.50   | 12b |
| 05    | 03    | 99   | METALS PROCESSING             | Metals Processing NEC                     |                      | 17.56    | 0.03    | 17.59    | 12c |
| 06    | 01    | 99   | PETROLEUM & RELATED INDUSTRIE | Oil & Gas Production                      |                      | 162.62   | 1.89    | 164.52   | 13  |
| 06    | 02    | 99   | PETROLEUM & RELATED INDUSTRIE | Petroleum Refineries & Related Industries |                      | 112.89   | 0.00    | 112.89   | 14  |
| 06    | 03    | 99   | PETROLEUM & RELATED INDUSTRIE | Asphalt Manufacturing                     |                      | 17.86    | 0.66    | 18.52    | 15  |
| 07    | 01    | 99   | OTHER INDUSTRIAL PROCESSES    | Agriculture, Food, & Kindred Products     |                      | 143.20   | 0.23    | 143.43   | 16  |
| 07    | 02    | 99   | OTHER INDUSTRIAL PROCESSES    | Textiles, Leather, & Apparel Products     |                      | 10.05    | 0.00    | 10.05    | 17  |
| 07    | 03    | 99   | OTHER INDUSTRIAL PROCESSES    | Wood, Pulp & Paper, & Publishing Products |                      | 235.35   | 0.00    | 235.35   | 18  |
| 07    | 04    | 99   | OTHER INDUSTRIAL PROCESSES    | Rubber & Miscellaneous Plastic Products   |                      | 15.33    | 0.00    | 15.33    | 19  |
| 07    | 05    | 01   | OTHER INDUSTRIAL PROCESSES    | Mineral Products                          | cement mfg           | 294.47   | 0.00    | 294.47   | 20  |
| 07    | 05    | 02   | OTHER INDUSTRIAL PROCESSES    | Mineral Products                          | glass mfg            | 118.34   | 0.00    | 118.34   | 21  |
| 07    | 05    | 99   | OTHER INDUSTRIAL PROCESSES    | Mineral Products                          |                      | 219.86   | 2.40    | 222.26   | 22  |
| 07    | 06    | 99   | OTHER INDUSTRIAL PROCESSES    | Machinery Products                        |                      | 11.35    | 0.30    | 11.66    | 23  |
| J7    | 07    | 99   | OTHER INDUSTRIAL PROCESSES    | Electronic Equipment                      |                      | 0.12     | 0.00    | 0.12     | 24  |
| 07    | 08    | 99   | OTHER INDUSTRIAL PROCESSES    | Transportation Equipment                  |                      | 0.96     | 0.00    | 0.96     | 25  |
| 07    | 10    | 99   | OTHER INDUSTRIAL PROCESSES    | Miscellaneous Industrial Processes        |                      | 16.71    | 2.00    | 18.71    | 26  |



|    |    |    |                            |   |                             |        |          |          |    |
|----|----|----|----------------------------|---|-----------------------------|--------|----------|----------|----|
| 08 | 01 | 99 | SOLVENT UTILIZATION        | Degreasing                              |                             | 0.84   | 0.00     | 0.84     | 27 |
| 08 | 02 | 99 | SOLVENT UTILIZATION        | Graphic Arts                            |                             | 20.71  | 0.00     | 20.71    | 28 |
| 08 | 03 | 99 | SOLVENT UTILIZATION        | Dry Cleaning                            |                             | 0.02   | 0.00     | 0.02     | 29 |
| 08 | 04 | 99 | SOLVENT UTILIZATION        | Surface Coating                         |                             | 122.04 | 0.17     | 122.21   | 30 |
| 08 | 05 | 99 | SOLVENT UTILIZATION        | Other Industrial                        |                             | 0.27   | 0.00     | 0.27     | 31 |
| 09 | 01 | 99 | STORAGE & TRANSPORT        | Bulk Terminals & Plants                 |                             | 11.01  | 0.00     | 11.01    | 32 |
| 09 | 02 | 99 | STORAGE & TRANSPORT        | Petroleum & Petroleum Product Storage   |                             | 12.74  | 0.00     | 12.74    | 33 |
| 09 | 03 | 99 | STORAGE & TRANSPORT        | Petroleum & Petroleum Product Transport |                             | 2.67   | 0.00     | 2.67     | 33 |
| 09 | 04 | 99 | STORAGE & TRANSPORT        | Service Stations: Stage I               |                             | 0.00   | 0.00     | 0.00     | 34 |
| 09 | 05 | 99 | STORAGE & TRANSPORT        | Service Stations: Stage II              |                             | 0.00   | 0.00     | 0.00     | 34 |
| 09 | 07 | 99 | STORAGE & TRANSPORT        | Organic Chemical Storage                |                             | 55.25  | 0.00     | 55.25    | 35 |
| 09 | 08 | 99 | STORAGE & TRANSPORT        | Organic Chemical Transport              |                             | 0.04   | 0.00     | 0.04     | 35 |
| 09 | 09 | 99 | STORAGE & TRANSPORT        | Inorganic Chemical Storage              |                             | 30.90  | 0.00     | 30.90    | 36 |
| 09 | 11 | 99 | STORAGE & TRANSPORT        | Bulk Materials Storage                  |                             | 0.00   | 0.00     | 0.00     | 37 |
| 09 | 12 | 99 | STORAGE & TRANSPORT        | Bulk Materials Transport                |                             | 0.00   | 0.00     | 0.00     | 37 |
| 10 | 01 | 99 | WASTE DISPOSAL & RECYCLING | Incineration                            |                             | 117.06 | 31.21    | 148.27   | 38 |
| 10 | 02 | 99 | WASTE DISPOSAL & RECYCLING | Open Burning                            |                             | 0.58   | 67.06    | 67.64    | 39 |
| 10 | 03 | 99 | WASTE DISPOSAL & RECYCLING | POTW                                    |                             | 33.71  | 0.00     | 33.71    | 40 |
| 10 | 05 | 99 | WASTE DISPOSAL & RECYCLING | TSDF                                    |                             |        | 0.00     | 0.00     | 41 |
| 10 | 06 | 99 | WASTE DISPOSAL & RECYCLING | Landfills                               |                             | 17.33  | 0.05     | 17.38    | 42 |
| 10 | 07 | 99 | WASTE DISPOSAL & RECYCLING | Other                                   |                             | 23.26  | 0.00     | 23.26    | 43 |
| 14 | 02 | 99 | MISCELLANEOUS              | Other Combustion                        |                             | 0.00   | 115.68   | 115.68   | 45 |
| 12 | 01 | 01 | OFF-HIGHWAY                | Non-Road Gasoline                       | recreational                |        | 13.04    | 13.04    | 90 |
| 12 | 01 | 02 | OFF-HIGHWAY                | Non-Road Gasoline                       | construction                |        | 114.48   | 114.48   | 90 |
| 12 | 01 | 03 | OFF-HIGHWAY                | Non-Road Gasoline                       | industrial                  |        | 178.93   | 178.93   | 90 |
| 12 | 01 | 04 | OFF-HIGHWAY                | Non-Road Gasoline                       | lawn & garden               |        | 47.92    | 47.92    | 90 |
| 12 | 01 | 05 | OFF-HIGHWAY                | Non-Road Gasoline                       | farm                        |        | 49.42    | 49.42    | 90 |
| 12 | 01 | 06 | OFF-HIGHWAY                | Non-Road Gasoline                       | light commercial            |        | 12.84    | 12.84    | 90 |
| 12 | 01 | 07 | OFF-HIGHWAY                | Non-Road Gasoline                       | logging                     |        | 0.19     | 0.19     | 90 |
| 12 | 01 | 08 | OFF-HIGHWAY                | Non-Road Gasoline                       | airport service             |        | 4.72     | 4.72     | 90 |
| 12 | 01 | 09 | OFF-HIGHWAY                | Non-Road Gasoline                       | recreational marine vessels |        | 69.30    | 69.30    | 90 |
| 12 | 01 | 99 | OFF-HIGHWAY                | Non-Road Gasoline                       |                             |        | 16.25    | 16.25    | 90 |
| 12 | 02 | 01 | OFF-HIGHWAY                | Non-Road Diesel                         | recreational                |        | 2.02     | 2.02     | 90 |
| 12 | 02 | 02 | OFF-HIGHWAY                | Non-Road Diesel                         | construction                |        | 2615.03  | 2615.03  | 90 |
| 12 | 02 | 03 | OFF-HIGHWAY                | Non-Road Diesel                         | industrial                  |        | 233.21   | 233.21   | 90 |
| 12 | 02 | 04 | OFF-HIGHWAY                | Non-Road Diesel                         | lawn & garden               |        | 16.92    | 16.92    | 90 |
| 12 | 02 | 05 | OFF-HIGHWAY                | Non-Road Diesel                         | farm                        |        | 650.28   | 650.28   | 90 |
| 12 | 02 | 06 | OFF-HIGHWAY                | Non-Road Diesel                         | light commercial            |        | 35.51    | 35.51    | 90 |
| 12 | 02 | 07 | OFF-HIGHWAY                | Non-Road Diesel                         | logging                     |        | 8.28     | 8.28     | 90 |
| 12 | 02 | 08 | OFF-HIGHWAY                | Non-Road Diesel                         | airport service             |        | 253.11   | 253.11   | 90 |
| 12 | 03 | 99 | OFF-HIGHWAY                | Aircraft                                |                             |        | 268.84   | 268.84   | 90 |
| 12 | 04 | 02 | OFF-HIGHWAY                | Marine Vessels                          | diesel                      |        | 281.77   | 281.77   | 90 |
| 12 | 04 | 03 | OFF-HIGHWAY                | Marine Vessels                          | residual oil                |        | 62.26    | 62.26    | 90 |
| 12 | 05 | 99 | OFF-HIGHWAY                | Railroads                               |                             |        | 1521.58  | 1521.58  | 90 |
|    |    |    |                            |   |                             |        | total =  | 38221.66 |    |
|    |    |    |                            |   |                             |        | + mobile | 13013.24 |    |
|    |    |    |                            |   |                             |        | TOTAL =  | 51234.90 |    |
|    |    |    |                            |   |                             |        |          |          |    |



| Boilers - Non-Utility  |         |                                       |                                   |  |                                 |                                  |                     |  |                                   |                                   |             |  |  |                        |                                 |                | COMMENTS   |
|--|---------|---------------------------------------|-----------------------------------|--|---------------------------------|----------------------------------|---------------------|--|-----------------------------------|-----------------------------------|-------------|--|--|------------------------|---------------------------------|----------------|--|
| NOx Emissions  | 30 TSPD | annual tuning (1)                     | low nox burners (LNB) (2)         | low excess air (3)                       | radiant burners (4)             | burners out of service (5)       | air (6)             | gas recirc. (7)                            | water injection (8)               | steam injection (9)               | return (10) | SCR (11)                               | SNCR (12)                                  | fuel: nat gas *** (13) | fuel: ultra-low diesel (14)     | derate ** (15) | and example RACT limit   |
| Secondary Impacts under optimal NOx reducing conditions: N = No Impact, R = reduce others in addition to NOx, I = may increase Non-NOx emissions |         |                                       |                                   |  |                                 |                                  |                     |  |                                   |                                   |             |  |  |                        |                                 |                |  |
| Boilers  |         |                                       |                                   |  |                                 |                                  |                     |  |                                   |                                   |             |  |  |                        |                                 |                |  |
| Natural Gas: 10 mmbtu/hr (packaged watertube)  | x       | 50<br>5850<br>1190<br>9030-11300      | 5-35<br>2500<br>387<br>7360-14700 | 70-80<br>3800<br>1060<br>5020-5730       |                                 |                                  |                     | 50-65<br>6110<br>1480<br>9360-11200        | 25-50<br>2500<br>827<br>5960-7950 | 25-50<br>2500<br>827<br>5960-7950 |             |  |  |                        | 40-65<br>0<br>1-300<br>0-2000 * | x              | All CA area regs. specify limit of 0.15 mmbtu/hr or less, m for boilers greater than 10 mmbtu/hr |
| Natural Gas: 50 mmbtu/hr (packaged watertube)  | x       | 50<br>2320<br>470<br>2560-3200        | 5-35<br>500<br>-18<br>-<0         | 80<br>6730<br>1960<br>6670-7630          |                                 | 20-40                            |                     | 50-65<br>4460<br>1000<br>4540-5450         | 25-50<br>500<br>221<br>1500-2000  | 25-50<br>500<br>221<br>1500-2000  |             | 80-90<br>6420<br>1510<br>4830-5480     | 30-60<br>3300<br>869<br>4720-5910          |                        | 60<br>0<br>0-300<br>0-2000 *    | x              | 0.10-0.43  |
| Natural Gas: 150 mmbtu/hr (field-erected watertube)  | x       | 40-55<br>1200<br>243<br>800-3500      | 5-35<br>168<br>-86<br>-<0         | 90<br>6520<br>1900<br>3500-3940          | 10-30<br>167<br>94<br>620-1030  | 35                               |                     | 50-65<br>2070<br>505<br>1390-3700          | 25-50<br>167<br>154<br>640-850    | 25-50<br>167<br>154<br>640-850    |             | 80-90<br>3770<br>996<br>2060-5600      | 30-60<br>3300<br>937<br>3100-6800          |                        | 40<br>0<br>0-300<br>0-2000 *    | x              | 0.20-0.43  |
| Distillate: 10 mmbtu/hr (firetube)   | x       | 45<br>5850<br>1190<br>5310-6640       | 5-25<br>2500<br>270<br>3020-6040  |  |                                 |                                  |                     | 15-30<br>6110<br>1480<br>11000-22000       | 15-35<br>2500<br>744<br>5550-8330 | 15-35<br>2500<br>744<br>5550-8330 |             |  |  | 40-65                  | 40-65<br>0<br>1-300<br>0-2000 * | x              | 0.12   |
| Distillate: 50 mmbtu/hr (packaged watertube)   | x       | 45<br>2320<br>470<br>2750-3440        | 5-25<br>500<br>-136<br>-<0        |  |                                 | 20-40                            |                     | 15-30<br>4160<br>1000<br>9780-19600        | 15-35<br>500<br>338<br>3900-4950  | 15-35<br>500<br>338<br>3900-4950  |             | 80-90<br>6420<br>1510<br>5200-5890     | 30-70<br>3300<br>862<br>5040-6310          | 60                     | 60<br>0<br>0-300<br>0-2000 *    | x              | 0.12   |
| Distillate: 150 mmbtu/hr (field-erected watertube)   | x       | 45<br>1200<br>243<br>600-750          | 5-25<br>167<br>-203<br>-<0        |  | 10-30<br>167<br>152<br>750-1250 | 25                               |                     | 15-30<br>2070<br>505<br>2060-4130          | 15-35<br>167<br>271<br>1110-1660  | 15-35<br>167<br>271<br>1110-1660  | 80          | 80-90<br>3770<br>1020<br>1560-1780     | 30-70<br>3300<br>997<br>2450-3060          | 40                     | 40<br>0<br>0-300<br>0-2000 *    | x              | 0.20-0.43  |
| Residual Oil: 10 mmbtu/hr (firetube)   | x       | 45<br>5850<br>1190<br>2910-3640       | 5-25<br>2500<br>372<br>2280-4570  |  |                                 |                                  |                     | 15-20<br>6110<br>1480<br>6040-12100        | 15-25<br>15-25                    | 15-25                             |             |  |  | 40-65                  | 40-65<br>0<br>0-300<br>0-2000 * | x              | LNB+FGR  |
| Residual Oil: 50 mmbtu/hr (packaged watertube)   | x       | 45<br>2320<br>470<br>990-1240         | 5-25<br>500<br>-33<br>-<0         |  |                                 | 20-40                            |                     | 15-30<br>4160<br>1000<br>3530-7060         | 15-35<br>500<br>500               | 15-35<br>500                      |             | 80-90<br>6420<br>1560<br>2070-2360     | 30-70<br>3300<br>1040<br>2160-2740         | 60                     | 60<br>0<br>0-300<br>0-2000 *    | x              | 0.20-0.43 or LNB+FGR   |
| Residual Oil: 150 mmbtu/hr (field-erected watertube)   | x       | 45<br>1200<br>243<br>490-610          | 5-25<br>167<br>-101<br>-<0        |  | 10-30<br>167<br>101<br>100-680  | 25                               |                     | 15-30<br>2070<br>505<br>1690-3370          | 15-35<br>167<br>271<br>1110-1660  | 15-35<br>167<br>271<br>1110-1660  | 80          | 80-90<br>3770<br>1030<br>1290-1480     | 30-70<br>3300<br>1050<br>2100-2630         | 40                     | 40<br>0<br>0-300<br>0-2000 *    | x              | 0.20-0.43  |
| Coal-fired: pulverized coal (500 mmbtu/hr)   | x       | 50<br>6500<br>779<br>760-2900         | 5-30                              |  | 10-30                           | 15-30<br>2060<br>298<br>580-1450 |                     |  |                                   |                                   | 60          | 80-90<br>12400<br>2750<br>1780-6800    | 30-70<br>1570<br>784<br>870-1450           | 65                     | 65                              | x              | 0.30-0.55 dry-bottom<br>0.55-1.00 wet-bottom   |
| Coal-fired: stoker (500 mmbtu/hr)  | x       |                                       | 5-30                              |  |                                 | 0-30<br>cost of<br>installation  |                     |  |                                   |                                   |             | 80-90<br>11800<br>2620<br>1980-2230    | 30-70<br>1570<br>687<br>940-1170           |                        |                                 | x              |  |
| Process Heaters/Steam Generating Units - Natural Draft   |         |                                       |                                   |  |                                 |                                  |                     |  |                                   |                                   |             |  |  |                        |                                 |                |  |
| Nat. gas: 25 mmbtu/hr  | x       | 30-60<br>82000<br>14000<br>2050-2560  | 5-20                              | 90+<br>convert to<br>mechanical<br>draft |                                 |                                  |                     | 50-60<br>convert to<br>mechanical<br>draft |                                   |                                   |             | 80-90<br>230000<br>45000<br>8190-10920 | 20-50<br>convert to<br>mechanical<br>draft |                        |                                 | x              | 0.10-0.20<br>SCAQMD -> 0.036   |
| Nat. Gas: 75 mmbtu/hr  | x       | 30-60<br>210000<br>36000<br>1720-2160 | 5-20                              | 90+<br>convert to<br>mechanical<br>draft |                                 |                                  |                     | 50-60<br>convert to<br>mechanical<br>draft |                                   |                                   |             | 80-90<br>440000<br>97000<br>5870-7820  | 20-50<br>convert to<br>mechanical<br>draft |                        |                                 | x              | 0.10-0.20<br>SCAQMD -> 0.036   |
| Nat. Gas: 200 mmbtu/hr   | x       | 30-60<br>350000<br>61000<br>1100-1370 | 5-20                              | 90+<br>convert to<br>mechanical<br>draft |                                 |                                  |                     | 50-60<br>convert to<br>mechanical<br>draft |                                   |                                   |             | 80-90<br>790000<br>20000<br>4500-6000  | 20-50<br>convert to<br>mechanical<br>draft |                        |                                 | x              | 0.10-0.20<br>SCAQMD -> 0.036   |
| Distillate Oil: 25 mmbtu/hr  | x       | 30-60<br>82000                        | 5-20                              |  |                                 |                                  | 30-60<br>convert to |  |                                   |                                   |             | 80-90<br>convert to                    | 30-60<br>230000                            | x                      | x                               | x              | 0.10-0.30<br>SCAQMD -> 0.036   |



|  |   |                                       |      |                                       |  |  |  |  |  |  |  |  |   |   |   |                             |
|--|---|---------------------------------------|------|---------------------------------------|--|--|--|--|--|--|--|--|---|---|---|-----------------------------|
|  |   | 14000<br>1430-1790                    |      |                                       |  |  | mechanical<br>draft                        |  |  |  | mechanical<br>draft                                | 48000<br>4880-6100                                 |   |   |   |                             |
| Distillate Oil: 75 mmbtu/hr  | x | 30-60<br>210000<br>38000<br>1200-1510 | 5-20 |                                       |  |  | 30-60<br>convert to<br>mechanical<br>draft |  |  |  | 80-90<br>convert to<br>mechanical<br>draft         | 30-60<br>440000<br>110000<br>3580-4470             | x | x | x | 0.10-0.30<br>SCAQMD → 0.05  |
| Distillate Oil: 200 mmbtu/hr   | x | 30-60<br>350000<br>61000<br>770-990   | 5-20 |                                       |  |  | 30-60<br>convert to<br>mechanical<br>draft |  |  |  | 80-90<br>convert to<br>mechanical<br>draft         | 30-60<br>790000<br>220000<br>2810-3510             | x | x | x | 0.10-0.30<br>SCAQMD → 0.05  |
| Residual Oil: 25 mmbtu/hr  | x | 30-60<br>82000<br>14000<br>680-850    | 5-20 |                                       |  |  | 30-50<br>convert to<br>mechanical<br>draft |  |  |  | 75-90<br>convert to<br>mechanical<br>draft         | 30-60<br>230000<br>50000<br>2410-3010              | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |
| Residual Oil: 75 mmbtu/hr  | x | 30-60<br>210000<br>38000<br>580-720   | 5-20 |                                       |  |  | 30-50<br>convert to<br>mechanical<br>draft |  |  |  | 75-90<br>convert to<br>mechanical<br>draft         | 30-60<br>440000<br>110000<br>1790-2230             | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |
| Residual Oil: 200 mmbtu/hr   | x | 30-60<br>350000<br>61000<br>370-490   | 5-20 |                                       |  |  | 30-50<br>convert to<br>mechanical<br>draft |  |  |  | 75-90<br>convert to<br>mechanical<br>draft         | 30-60<br>790000<br>240000<br>1420-1780             | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |
| Process Heaters/Steam Generating Units – Mechanical Draft<br>Nat. Gas: 25 mmbtu/hr | x | 30-60<br>120000<br>21000<br>1850-2070 | 5-20 | 90+<br>180000<br>57000<br>2340-2610   |  |  | 50-60<br>91000<br>20000<br>1300-1550       |  |  |  | 80-90<br>380000<br>77000<br>3300-3800<br>4820-6170 | 20-50<br>230000<br>47000<br>3300-3800<br>4820-6170 |   |   | x | 0.10-0.20<br>SCAQMD → 0.038 |
| Nat. Gas: 75 mmbtu/hr  | x | 30-60<br>310000<br>54000<br>1390-1740 | 5-20 | 90+<br>50000<br>180000<br>2210-2470   |  |  | 50-60<br>180000<br>40000<br>870-1050       |  |  |  | 80-90<br>740000<br>170000<br>2800-3500             | 20-50<br>440000<br>100000<br>3370-4500             |   |   | x | 0.10-0.20<br>SCAQMD → 0.038 |
| Nat. Gas: 200 mmbtu/hr   | x | 30-60<br>530000<br>91000<br>890-1110  | 5-20 | 90+<br>1300000<br>420000<br>2170-2420 |  |  | 50-60<br>320000<br>77000<br>630-750        |  |  |  | 80-90<br>1330000<br>340000<br>2000-2700            | 20-50<br>790000<br>220000<br>2840-3510             |   |   | x | 0.10-0.20<br>SCAQMD → 0.038 |
| Distillate Oil: 25 mmbtu/hr  | x | 30-60<br>120000<br>21000<br>1340-1680 | 5-20 |                                       |  |  | 30-60<br>91000<br>20000<br>1580-2100       |  |  |  | 80-90<br>380000<br>83000<br>2920-3280              | 30-60<br>230000<br>50000<br>3190-3980              | x | x | x | 0.10-0.30<br>SCAQMD → 0.05  |
| Distillate Oil: 75 mmbtu/hr  | x | 30-60<br>310000<br>54000<br>1130-1410 | 5-20 |                                       |  |  | 30-60<br>180000<br>40000<br>1070-1420      |  |  |  | 80-90<br>740000<br>180000<br>21180-2430            | 30-60<br>440000<br>110000<br>2370-2970             | x | x | x | 0.10-0.30<br>SCAQMD → 0.05  |
| Distillate Oil: 200 mmbtu/hr   | x | 30-60<br>530000<br>91000<br>720-900   | 5-20 |                                       |  |  | 30-60<br>320000<br>77000<br>770-1020       |  |  |  | 80-90<br>1330000<br>390000<br>1710-1930            | 30-60<br>790000<br>240000<br>1900-2370             | x | x | x | 0.10-0.30<br>SCAQMD → 0.05  |
| Residual Oil: 25 mmbtu/hr  | x | 30-60<br>120000<br>21000<br>800-1000  | 5-20 |                                       |  |  | 30-50<br>91000<br>20000<br>930-1250        |  |  |  | 75-90<br>380000<br>78000<br>1830-1830              | 30-60<br>230000<br>52000<br>1950-2440              | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |
| Residual Oil: 75 mmbtu/hr  | x | 30-60<br>310000<br>54000<br>670-840   | 5-20 |                                       |  |  | 30-50<br>180000<br>40000<br>630-840        |  |  |  | 75-90<br>740000<br>170000<br>1180-1330             | 30-60<br>440000<br>120000<br>1470-1840             | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |
| Residual Oil: 200 mmbtu/hr   | x | 30-60<br>350000<br>61000<br>290-390   | 5-20 |                                       |  |  | 30-50<br>320000<br>77000<br>450-600        |  |  |  | 75-90<br>1330000<br>350000<br>910-1030             | 30-60<br>790000<br>250000<br>1180-1490             | x | x | x | 0.23-0.40<br>SCAQMD → 0.05  |

\* These cost effectivenesses are for the utilization of Ultra-low diesel as the stand-by fuel. It does not include the full time replacement of the primary fuel.

\*\* Derating usually requires compensation, like additional boilers; this may have a cost penalty or negate reductions achieved.

\*\*\* Fuel switching to Natural Gas is unit-specific and could have a significant capital and operating cost penalty, and possibly an energy cost penalty.



| <div> <div> <div>ing I.C. Engines and</div> <div>Gas Turbines</div> </div> <div> <div>Potential Reduction - %</div> <div>Capital Cost - \$</div> <div>Annual Cost - \$/yr</div> <div>Cost Effectiveness - \$/ton</div> </div> </div> |                                 |                           |                           |     |  |                                   |   |                                     |                                    |                                      |                                     |     | COMMENTS           |
|--|---------------------------------|---------------------------|---------------------------|-----|--|-----------------------------------|---|-------------------------------------|------------------------------------|--------------------------------------|-------------------------------------|-----|--------------------|
| NOx Emissions = 1738.33 TPSD   |                                 |                           |                           |     |  |                                   |   |                                     |                                    |                                      |                                     |     | sample RACT limits |
| annual<br>tuning<br>(1)  | low nox<br>burners (LNB)<br>(2) | water<br>injection<br>(3) | steam<br>injection<br>(4) | (5) | fuel: ultra-<br>low diesel<br>(6)      | low-emission<br>combustion<br>(7) | air/fuel<br>ratio<br>(8)                | ignit. timing<br>retard<br>(9)      | pre-stratified<br>charge<br>(10)   | NSCR<br>(11)                         | electrification<br>(12)             |     |                    |
| Secondary Impacts under optimal NOx reducing conditions<br>N - No impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions   |                                 |                           |                           |     |  |                                   |   |                                     |                                    |                                      |                                     |     |                    |
| Reciprocating Internal Combustion Engines - spark ignition   |                                 |                           |                           |     |  |                                   |   |                                     |                                    |                                      |                                     |     |                    |
| SI Nat. Gas Rich-Burn 250 hp   | x                               |                           |                           |     | 90-98                                  |                                   | 70-90<br>400000<br>130000<br>4500-5010  | 10-40<br>11000<br>6000<br>580-870   | 0-40<br>12000<br>6000<br>680-1130  | 80-90<br>62000<br>84000<br>2670-3000 | 90-98<br>20000<br>10000<br>290-310  | 100 | 1.5-2.5 g/bhp-hr   |
| SI Nat. Gas Rich-Burn 1000 hp  | x                               |                           |                           |     | 90-98                                  |                                   | 70-90<br>670000<br>220000<br>1850-2090  | 10-40<br>16000<br>15000<br>350-520  | 0-40<br>18000<br>13000<br>370-610  | 80-90<br>130000<br>110000<br>880-990 | 90-98<br>42000<br>27000<br>200-220  | 100 | 1.5-2.5 g/bhp-hr   |
| SI Nat. Gas Rich-Burn 4000 hp  | x                               |                           |                           |     | 90-98                                  |                                   | 70-90<br>1720000<br>560000<br>1190-1340 | 10-40<br>25000<br>45000<br>270-400  | 0-40<br>25000<br>38000<br>270-450  | 80-90<br>170000<br>130000<br>260-300 | 90-98<br>130000<br>96000<br>180-190 | 100 | 1.5-2.5 g/bhp-hr   |
| SI Nat. Gas Lean-Burn 250 hp   | x                               |                           |                           |     | 90<br>310000<br>140000<br>4280-4810    |                                   | 80-93<br>400000<br>130000<br>3970-4460  | 5-30<br>74000<br>28000<br>3510-4680 | 0-20<br>12000<br>5000<br>680-4930  |                                      |                                     | 100 | 2.5-3.0 g/bhp-hr   |
| SI Nat. Gas Lean-Burn 1000 hp  | x                               |                           |                           |     | 90<br>340000<br>180000<br>1320-1490    |                                   | 80-93<br>670000<br>220000<br>1610-1820  | 5-30<br>78000<br>31000<br>1060-1420 | 0-20<br>16000<br>11000<br>490-1470 |                                      |                                     | 100 | 2.5-3.0 g/bhp-hr   |
| SI Nat. Gas Lean-Burn 4000 hp  | x                               |                           |                           |     | 90<br>470000<br>310000<br>580-660      |                                   | 80-93<br>1720000<br>550000<br>1030-1150 | 5-30<br>84000<br>53000<br>450-600   | 0-20<br>25000<br>30000<br>340-1020 |                                      |                                     | 100 | 2.5-3.0 g/bhp-hr   |
| Reciprocating Internal Combustion Engines - compression ignition   |                                 |                           |                           |     |  |                                   |   |                                     |                                    |                                      |                                     |     |                    |
| CI Diesel 250 hp, continuous (8000 hrs)  | x                               |                           |                           |     | 80-90<br>190000<br>99000<br>4170-4690  | 80-90<br>0<br>74000<br>2000-2500  |   | 20-30<br>12000<br>6000<br>780-1140  |                                    |                                      | 100                                 |     | 8.0-9.0 g/bhp-hr   |
| CI Diesel 1000 hp, continuous  | x                               |                           |                           |     | 80-90<br>250000<br>140000<br>1460-1640 | 80-90<br>0<br>74000<br>2000-2500  |   | 20-30<br>16000<br>13000<br>420-630  |                                    |                                      | 100                                 |     |                    |
| CI Diesel 4000 hp, continuous  | x                               |                           |                           |     | 80-90<br>510000<br>300000<br>780-880   | 80-90<br>0<br>74000<br>2000-2500  |   | 20-30<br>25000<br>40000<br>310-470  |                                    |                                      | 100                                 |     |                    |
| CI Diesel 250 hp, peaking (2000 hrs)   | x                               |                           |                           |     | 80-90<br>190000<br>49000<br>6750       | 80-90<br>0<br>18500<br>2000-2500  |   | 20-30<br>12000<br>3030<br>1900      |                                    |                                      | 100                                 |     |                    |
| CI Diesel 1000 hp, peaking (2000 hrs)  | x                               |                           |                           |     | 80-90<br>250000<br>67000<br>3000       | 80-90<br>0<br>18500<br>2000-2500  |   | 20-30<br>16000<br>5300<br>630       |                                    |                                      | 100                                 |     |                    |
| CI Diesel 4000 hp, peaking (2000 hrs)  | x                               |                           |                           |     | 80-90<br>510000<br>140000<br>1560      | 80-90<br>0<br>18500<br>2000-2500  |   | 20-30<br>25000<br>13000<br>515      |                                    |                                      | 100                                 |     |                    |
| CI Diesel 250 hp, peaking (200 hrs)  | x                               |                           |                           |     | 80-90<br>190000<br>34000<br>61000      | 80-90<br>0<br>1850<br>2000-2500   |   | 20-30<br>12000<br>2140<br>13400     |                                    |                                      | 100                                 |     |                    |
| CI Diesel 1000 hp, peaking (200 hrs)   | x                               |                           |                           |     | 80-90<br>250000<br>45000<br>20000      | 80-90<br>0<br>1850<br>2000-2500   |   | 20-30<br>16000<br>3000<br>4600      |                                    |                                      | 100                                 |     |                    |
| CI Diesel 4000 hp, peaking (200 hrs)   | x                               |                           |                           |     | 80-90<br>250000<br>0                   | 80-90<br>0                        |   | 20-30<br>25000                      |                                    |                                      | 100                                 |     |                    |



|   |   |  |   |   |  |                                 |  |  |                                    |  |  |     |  |
|---|---|--|---|---|--|---------------------------------|--|--|------------------------------------|--|--|-----|--|
|   |   |  |   |   | 92000<br>10000                         | 1850<br>2000-2500               |  |  | 5100<br>2010                       |  |  |     |  |
| CI Dual Fuel 250 hp                       | x |  |   |   | 80-90<br>190000<br>98000<br>5800-6530  |                                 | 60-80<br>520000<br>170000<br>11370-12090 |  | 20-30<br>12000<br>5000<br>950-1420 |  |  | 100 |  |
| CI Dual Fuel 1000 hp                      | x |  |   |   | 80-90<br>250000<br>130000<br>1970-2210 |                                 | 60-80<br>880000<br>280000<br>4650-5310   |  | 20-30<br>18000<br>11000<br>470-700 |  |  | 100 |  |
| CI Dual Fuel 4000 hp                      | x |  |   |   | 80-90<br>510000<br>270000<br>1010-1140 |                                 | 60-80<br>2210000<br>710000<br>2960-3390  |  | 20-30<br>25000<br>29000<br>320-480 |  |  | 100 |  |
| Gas Turbines                              |   |  |   |   |  |                                 |  |  |                                    |  |  |     |  |
| Gas-fired: 5 MW continuous (8000 hrs/yr)  | x | 80-90<br>482000<br>63400<br>530-800    | 70-90<br>544000<br>165000<br>1390-1780  | 70-90<br>710000<br>185000<br>1560-2000  | 90<br>572000<br>258000<br>2180-2450    | 75-85<br>0<br>0-300<br>0-2000 * |  |  |                                    |  |  |     |  |
| Gas-fired: 25 MW, continuous              | x | 80-90<br>1100000<br>145000<br>240-370  | 70-90<br>1140000<br>408000<br>690-880   | 70-90<br>1610000<br>448000<br>780-970   | 90<br>1540000<br>732000<br>1230-1390   | 75-85<br>0<br>0-300<br>0-2000 * |  |  |                                    |  |  |     |  |
| Gas-fired: 100 MW, continuous             | x | 80-90<br>2400000<br>316000<br>130-200  | 70-90<br>2580000<br>1180000<br>500-640  | 70-90<br>3900000<br>1250000<br>520-670  | 90<br>3300000<br>2190000<br>920-1030   | 75-85<br>0<br>0-300<br>0-2000 * |  |  |                                    |  |  |     |  |
| Gas-fired: 25 MW, peaking (2000 hrs/yr)   | x | 80-90<br>1100000<br>258000<br>980-1470 | 70-90<br>1140000<br>248000<br>1670-2150 | 70-90<br>1610000<br>319000<br>2150-2780 | 90<br>1540000<br>517000<br>3480-3920   | 75-80<br>0<br>18500<br>60000 *  |  |  |                                    |  |  |     |  |
| Gas-fired: 100 MW, peaking                | x | 80-90<br>2400000<br>316000<br>530-800  | 70-90<br>2580000<br>824000<br>1050-2150 | 70-90<br>3900000<br>813000<br>1370-1780 | 90<br>3300000<br>1430000<br>2400-2700  | 75-80<br>0<br>18500<br>60000 *  |  |  |                                    |  |  |     |  |
| Oil-fired: 5 MW, continuous (8000 hrs/yr) | x |  | 70-90<br>570000<br>195000<br>1000-1300  | 70-90<br>745000<br>200000<br>1010-1300  | 90<br>572000<br>274000<br>1390-1560    |                                 |  |  |                                    |  |  |     |  |
| Oil-fired: 25 MW, continuous              | x |  | 70-90<br>1210000<br>547000<br>560-710   | 70-90<br>1730000<br>514000<br>520-670   | 90<br>1544000<br>812000<br>820-920     |                                 |  |  |                                    |  |  |     |  |
| Oil-fired: 100 MW, continuous             | x |  | 70-90<br>2800000<br>1720000<br>440-560  | 70-90<br>4230000<br>1490000<br>380-480  | 90<br>3302000<br>2500000<br>630-710    |                                 |  |  |                                    |  |  |     |  |
| Oil-fired: 25 MW, peaking (2000 hrs/yr)   | x |  | 70-90<br>1210000<br>292000<br>1190-1520 | 70-90<br>1730000<br>350000<br>1520-1820 | 90<br>1540000<br>537000<br>2170-2440   |                                 |  |  |                                    |  |  |     |  |
| Oil-fired: 100 MW, peaking                | x |  | 70-90<br>2800000<br>786000<br>800-1020  | 70-90<br>4231000<br>917000<br>930-1190  | 90<br>3300000<br>1510000<br>1530-1720  |                                 |  |  |                                    |  |  |     |  |

\* These cost effectivenesses are for the utilization of Ultra-low diesel as the stand-by fuel. It does not include the full time replacement of the primary fuel.



| Residential Fuel Combustion<br>NOx Emissions = 192.39 TPSD<br><small>Potential Reduction - %<br/>Capital Cost - \$<br/>Annual Cost - \$/yr<br/>Cost Effectiveness - \$/ton</small> | annual<br>tuning<br>(1) | 0.09 CARB limit<br>using LNB and LEA<br>tuning on new units<br>(2) | LNB<br>(Perforated)<br>(3) | LNB<br>(Modulating)<br>(4) | Solar<br>Assistance<br>(5) | Solar panels<br>(6) | Electric<br>heat pump<br>(7) | Incentives for<br>incr. turnover<br>(8) | COMMENTS<br>and example RAC units  |
|--|-------------------------|--|----------------------------|----------------------------|----------------------------|---------------------|------------------------------|---|--|
| Secondary Impacts under optimal Nx reducing conditions<br>N - No impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions                                  |                         | R  | R, I (CO & HC)             | R, I (CO & HC)             | N                          | N                   | R                            |   | A number of air agencies have set a 0.09 lb/mmBtu limit for new space and water heaters, using LNBs and low excess air tuning. Estimated 50% emissions reduction. SCAQMD est. that 0.02 is possible. |
| Natural gas water heaters, natural gas space heaters and oil space heaters. (All less than 175,000 btu/hr)   | x                       | 50+<br>50-300<br>0<br>1600   | 80<br><br>2300-7100        | 70<br><br>1200-5800        | 50+<br><br>                | 100<br><br>62,500   | 100<br><br>                  |   |  |

| Cement Mfg.<br>NOx Emissions = 294.47 TPSD<br><small>Potential Reduction - %<br/>Capital Cost - \$<br/>Annual Cost - \$/yr<br/>Cost Effectiveness - \$/ton</small><br>There are 213 cement kilns at 98 plants in the U.S.; Over comes from 4 states. | annual<br>tuning<br>(1) | Process<br>Modifications<br>(2) | low nox<br>burners (LNB)<br>(3) | Mid-Kiln firing<br>with LNB<br>(4) | SNCR<br>(Urea)<br>(5)    | SNCR<br>(Ammonia)<br>(6)  | SCR<br>(7)                    | staged<br>combust.<br>(8) | COMMENTS         |
|--|-------------------------|---------------------------------|---------------------------------|------------------------------------|--------------------------|---------------------------|-------------------------------|---------------------------|------------------|
| Secondary Impacts under optimal Nx reducing conditions<br>N - No impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions  |                         |                                 | I (CO & HC)                     | I (CO & HC)                        | I                        | I                         | I                             | R                         | There is an ACT. |
| Long Wet Kiln - 30 tons/clinker/hr   | x                       | <25                             | 20-30<br>1640<br><br>1130       | 20-40<br>718<br><br>550            |                          |                           | 80-90<br>12800000<br><br>3600 |                           |                  |
| Long Wet Kiln - 50   | x                       | <25                             | 20-30<br>2180<br><br>880        | 20-40<br>748<br><br>450            |                          |                           | 80-90<br>17400000<br><br>3140 |                           |                  |
| Long Dry Kiln - 25   | x                       | <25                             | 20-30<br>1270<br><br>1270       | 20-40<br>708<br><br>610            |                          |                           | 80-90<br>9870000<br><br>3630  |                           |                  |
| Long Dry Kiln - 40   | x                       | <25                             | 20-30<br>1640<br><br>970        | 20-40<br>728<br><br>470            |                          |                           | 80-90<br>13110000<br><br>3170 |                           |                  |
| Preheater Kiln - 40  | x                       | <25                             | 20-30<br>1490<br><br>1330       |                                    | 30-70<br>671<br><br>930  | 30-70<br>1340<br><br>1100 | 80-90<br>12000000<br><br>4120 |                           |                  |
| Preheater Kiln - 70  | x                       | <25                             | 20-30<br>2040<br><br>970        |                                    | 30-70<br>927<br><br>790  | 30-70<br>1850<br><br>910  | 80-90<br>16800000<br><br>3490 |                           |                  |
| Precalciner Kiln - 100   | x                       | <25                             | 20-30<br>1720<br><br>1010       |                                    | 30-70<br>969<br><br>880  | 30-70<br>1650<br><br>980  | 80-90<br>19300000<br><br>4870 | 29-46                     |                  |
| Precalciner Kiln - 150   | x                       | <25                             | 20-30<br>2170<br><br>830        |                                    | 30-70<br>1240<br><br>800 | 30-70<br>2110<br><br>880  | 80-90<br>24800000<br><br>4400 | 29-46                     |                  |

| Metals Processing - Ferrous  |   |  |                  |                          |               |               |         |                   |               |      |                                       |
|--|---|--|------------------|--------------------------|---------------|---------------|---------|-------------------|---------------|------|---------------------------------------|
| NOx Emissions = 225.51 TPSD  |   | Potential Reduction - %<br>Capital Cost - \$<br>Annual Cost - \$/yr<br>Cost Effectiveness - \$/ton | annual<br>tuning | low nox<br>burners (LNB) | LNB+FGR       | LNB+SNCR      | LNB+SCR | low excess<br>air | SCR           | SNCR | COMMENTS                              |
|  |   |  | (1)              | (2)                      | (3)           | (4)           | (5)     | (6)               | (7)           | (8)  |                                       |
| Secondary Impacts under optimal NOx reducing conditions<br>N - No Impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions |   |  |                  | I (CO & HC)              | N             | I             | I       | I (CO & HC)       | I             | I    | Most Furnaces are 100 to 520 mmbtu/hr |
| Reheat Furnace - Preheat air<br>140 mmbtu/hr   | x |  | 33-34            | 55                       |               |               |         | 12                |               |      |                                       |
|  |   |  | 53900<br>700     | 56500<br>400             |               |               |         | 33400<br>1120     |               |      |                                       |
| 300 mmbtu/hr   | x |  | 33-34            | 55                       |               |               |         | 12                |               |      |                                       |
|  |   |  | 85300<br>520     | 89200<br>340             |               |               |         | 52300<br>820      |               |      |                                       |
| 520 mmbtu/hr   | x |  | 33-34            | 55                       |               |               |         | 12                |               |      |                                       |
|  |   |  | 118000<br>420    | 124000<br>270            |               |               |         | 72800<br>600      |               |      |                                       |
| Reheat Furnace - Cold Air<br>140 mmbtu/hr  | x |  | 33               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 8100<br>280      |                          |               |               |         |                   |               |      |                                       |
| 300 mmbtu/hr   | x |  | 33               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 12800<br>210     |                          |               |               |         |                   |               |      |                                       |
| 520 mmbtu/hr   | x |  | 33               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 17700<br>170     |                          |               |               |         |                   |               |      |                                       |
| Annealing Furnaces<br>100 mmbtu/hr   | x |  | 50               | 82                       | 79            | 96            |         | 85                | 60            |      |                                       |
|  |   |  | 93000<br>380     | 93000<br>230             | 240000<br>620 | 340000<br>720 |         | 280000<br>630     | 150000<br>510 |      |                                       |
| 200 mmbtu/hr   | x |  | 50               | 82                       | 79            | 96            |         | 85                | 60            |      |                                       |
|  |   |  | 140000<br>290    | 140000<br>180            | 410000<br>520 | 520000<br>540 |         | 400000<br>480     | 280000<br>450 |      |                                       |
| 300 mmbtu/hr   | x |  | 50               | 82                       | 79            | 96            |         | 85                | 60            |      |                                       |
|  |   |  | 180000<br>240    | 180000<br>150            | 550000<br>470 | 680000<br>480 |         | 510000<br>400     | 410000<br>420 |      |                                       |
| Galvanizing Furnace - Preheat air<br>50 mmbtu/hr   | x |  |                  | 77                       |               |               |         |                   |               |      |                                       |
|  |   |  |                  | 32000<br>180             |               |               |         |                   |               |      |                                       |
| 150 mmbtu/hr   | x |  |                  | 77                       |               |               |         |                   |               |      |                                       |
|  |   |  |                  | 69000<br>130             |               |               |         |                   |               |      |                                       |
| 200 mmbtu/hr   | x |  |                  | 77                       |               |               |         |                   |               |      |                                       |
|  |   |  |                  | 82000<br>120             |               |               |         |                   |               |      |                                       |
| Galvanizing Furnace - Cold air<br>50 mmbtu/hr  | x |  | 35               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 32000<br>-       |                          |               |               |         |                   |               |      |                                       |
| 150 mmbtu/hr   | x |  | 35               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 69000<br>-       |                          |               |               |         |                   |               |      |                                       |
| 200 mmbtu/hr   | x |  | 35               |                          |               |               |         |                   |               |      |                                       |
|  |   |  | 82000<br>-       |                          |               |               |         |                   |               |      |                                       |



| Wood, Pulp & Paper Manuf.  |   |                         |   |     |                                 | COMMENTS   |
|--|---|-------------------------|---|-----|---------------------------------|--|
| NOx Emissions = 235.35 TPSD  | Potential Reduction - %<br>Capital Cost - \$/mmBtu/hr<br>Annual Cost - \$/yr<br>Cost Effectiveness - \$/ton | annual<br>tuning<br>(1) | Low Excess air<br>with air staging<br>(2) | (3) | SNCR<br>(4)                     |  |
| Secondary Impacts under optimal NOx reducing conditions<br>N - No Impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions |   |                         | I (CO & HC)                               | I   | I                               |  |
| Recovery Boilers at wood, pulp & paper manuf.  | x   |                         | 0-20                                      |     | 35-60<br>2500-4300<br>1000-1600 | It is likely that most of these units already employ low excess air and air staging to some degree. Reduction potential could be optimistic. |
| Industrial Boilers at these facilities can be controlled as is detailed under the section for Industrial Boilers                                   |   |                         |   |     |                                 |  |
| Lime Kilns at these facilities can be controlled as is detailed under the section for Cement Manuf.  |   |                         |   |     |                                 |  |

| Agricultural Chemical Manuf.   |  |                         |                                 |                          |                           |                            |                                  |                                    |             |                                   | COMMENTS<br>and example RACT limits   |
|--|--|-------------------------|---------------------------------|--------------------------|---------------------------|----------------------------|----------------------------------|------------------------------------|-------------|-----------------------------------|---|
| NOx Emissions = 205.51 TPSD  | Potential Reduction - %<br>Capital Cost - \$<br>Annual Cost - \$/yr<br>Cost Effectiveness - \$/ton | annual<br>tuning<br>(1) | low nox<br>burners (LNB)<br>(2) | low excess<br>air<br>(3) | radiant<br>burners<br>(4) | flue gas<br>recirc.<br>(5) | SCR<br>(6)                       | NSCR<br>(7)                        | SNCR<br>(8) | extended<br>absorption<br>(9)     |   |
| Secondary Impacts under optimal NOx reducing conditions<br>N - No Impact, R - reduce others in addition to NOx, I - may increase Non-NOx emissions         |  |                         | I (CO)                          | I (CO & HC)              | N                         | N                          | I                                | I                                  | I           |                                   | There is an ACT   |
| Ammonia Production - 44 plants in U.S.<br>Primary Reformer, nat. gas fired<br>These process can be controlled as is detailed under the section for Boilers | x  | x                       | x                               | x                        | x                         | x                          |                                  |                                    | x           |                                   | 11 of the 44 ammonia plants are located in Louisiana  |
| Nitric Acid Production - 64 plants in U.S., about 87% in OTAG<br>200 tons/day of HNO3  | x  |                         |                                 |                          |                           |                            | 44-88<br>314000<br>188000<br>305 | 94-99<br>1070000<br>501000<br>715  |             | 93-97<br>919000<br>202000<br>297  | Texas has a limit of 2.0 lb of NOx per ton HNO3 produced, which is about 95% control. NSPS is 3.0 lb/ton. |
| 500 tons/day of HNO3   | x  |                         |                                 |                          |                           |                            | 44-88<br>409000<br>442000<br>285 | 94-99<br>1860000<br>1020000<br>580 |             | 93-97<br>1610000<br>250000<br>147 |   |
| 1000 tons/day of HNO3  | x  |                         |                                 |                          |                           |                            | 44-88<br>553000<br>714000<br>231 | 94-99<br>2820000<br>1780000<br>507 |             | 93-97<br>2470000<br>257000<br>76  |   |

| Oil and Gas Production<br>NOx Emissions = 164.52 TPSD   | annual<br>tuning | SCR | COMMENTS   |
|---|------------------|-----|--|
| Secondary Impacts under optimal NOx reducing conditions<br>N - No impact, R - reduce others in addition to NOx, I -<br>may increase Non-NOx emissions |                  | I   | Most emissions come from Natural Gas<br>compressors in Texas |
| Natural Gas Production - Compressors  | x                | x   | No detailed control data available                           |

| Incineration<br>NOx Emissions = 148.28  | Potential Reduction - %<br>Capital Cost - \$<br>Annual Cost - \$/yr<br>Cost Effectiveness - \$/ton | annual<br>tuning<br>(1) | low excess<br>air<br>(2) | staged<br>combust.<br>(3) | flue gas<br>recirc.<br>(4) | nat. gas<br>reburn<br>(5) | SCR<br>(6) | SNCR<br>(7)                   | COMMENTS<br>and example RACT limits   |
|---|--|-------------------------|--------------------------|---------------------------|----------------------------|---------------------------|------------|-------------------------------|---|
| Secondary Impacts under optimal NOx reducing conditions<br>N - No impact, R - reduce others in addition to NOx, I -<br>may increase Non-NOx emissions |  |                         | I (CO & HC)              | R                         | N                          | R                         | I          | I                             |   |
| Waste Incinerators (including Municipal, Medical,<br>Hazardous and Sewage Sludge Incineration)<br>(Only units over 100 mmbtu/hr)                      |  | x                       | 24-35                    | 24-35                     | 10-25                      | 50-60                     | 45-77      | 50-75<br>0.5-1.2M<br>800-1500 | MACT standards for NOx:<br>0.43 lb/mmbtu for existing mass-burn waterwall units<br>0.53 lb/mmbtu for existing refuse-derived fuel limits<br>0.32 for new units<br>Approximately 169 units at 65 plants with capacities of<br>250 TPD or more (250 TPD = 100 mmbtu/hr) |

[illegible]





[illegible]



**EMISSIONS EVALUATION FOR JULY 8-9, 1996 MEETING**  
**Southeast Pennsylvania Ozone Stakeholders Group**

**E.H. PECHAN & ASSOCIATES, INC.**





## **PRESENTATION SUMMARY**

1. 1990 Emissions (with revisions)
  - Five County Area
  - Ozone Nonattainment Area
2. 1996 Emissions
  - Five County Area
3. Growth Assumptions Affecting 1996 and 2005 Analyses
4. Regional (4-State) Emissions Analyses
5. Candidate Measures and Emissions Evaluation

**Table 1**  
**1990 Ozone Season Daily Emissions for the Pennsylvania Counties in the Philadelphia**  
**NAA**  
**Tier 2 Source Category Summary**

| Source Category                           | Daily Emissions (tons/day) |             |             |
|---|----------------------------|-------------|-------------|
|   | VOC                        | NOx         | CO          |
| <b>FUEL COMB. ELEC. UTIL.</b>             | <b>1.0</b>                 | <b>74.2</b> | <b>6.1</b>  |
| Coal                                      | 0.2                        | 38.8        | 1.5         |
| Oil                                       | 0.5                        | 25.6        | 3.1         |
| Gas                                       | 0.0                        | 5.1         | 0.4         |
| Other                                     | 0.0                        | 0.4         | 0.0         |
| Internal Combustion                       | 0.3                        | 4.4         | 1.1         |
| <b>FUEL COMB. INDUSTRIAL</b>              | <b>0.8</b>                 | <b>76.0</b> | <b>9.3</b>  |
| Coal                                      | 0.0                        | 4.8         | 0.1         |
| Oil                                       | 0.0                        | 10.3        | 0.9         |
| Gas                                       | 0.3                        | 42.8        | 5.2         |
| Other                                     | 0.0                        | 0.7         | 0.0         |
| Internal Combustion                       | 0.5                        | 17.4        | 3.1         |
| <b>FUEL COMB. OTHER</b>                   | <b>1.0</b>                 | <b>26.8</b> | <b>5.8</b>  |
| Commercial/Institutional Coal             | 0.0                        | 0.8         | 0.0         |
| Commercial/Institutional Oil              | 0.3                        | 10.9        | 2.6         |
| Commercial/Institutional Gas              | 0.7                        | 13.6        | 2.7         |
| Misc. Fuel Comb. (Except Residential)     | 0.0                        | 0.7         | 0.2         |
| Residential Other                         | 0.0                        | 0.9         | 0.3         |
| <b>CHEMICAL &amp; ALLIED PRODUCT MFG</b>  | <b>14.8</b>                | <b>0.1</b>  | <b>0.0</b>  |
| Organic Chemicals                         | 8.8                        | 0.0         | 0.0         |
| Inorganic Chemicals                       | 0.1                        | 0.1         | 0.0         |
| Polymers & Resins                         | 0.7                        | 0.0         | 0.0         |
| Paints, Varnishes, Lacquers, Enamels      | 1.6                        | 0.0         | 0.0         |
| Pharmaceuticals                           | 0.8                        | 0.0         | 0.0         |
| Other Chemicals                           | 2.8                        | 0.0         | 0.0         |
| <b>METALS PROCESSING</b>                  | <b>0.6</b>                 | <b>1.5</b>  | <b>36.0</b> |
| Non-Ferrous Metals Processing             | 0.2                        | 0.0         | 0.0         |
| Ferrous Metals Processing                 | 0.5                        | 1.5         | 36.0        |
| <b>PETROLEUM &amp; RELATED INDUSTRIES</b> | <b>21.5</b>                | <b>10.0</b> | <b>17.9</b> |
| Petroleum Refineries & Related Industries | 21.2                       | 9.8         | 17.7        |
| Asphalt Manufacturing                     | 0.3                        | 0.2         | 0.2         |
| <b>OTHER INDUSTRIAL PROCESSES</b>         | <b>2.3</b>                 | <b>2.8</b>  | <b>0.6</b>  |
| Agriculture, Food, & Kindred Products     | 1.5                        | 0.0         | 0.0         |
| Wood, Pulp & Paper, & Publishing Products | 0.1                        | 0.0         | 0.0         |
| Rubber & Miscellaneous Plastic Products   | 0.6                        | 0.0         | 0.0         |
| Mineral Products                          | 0.0                        | 2.8         | 0.6         |
| Machinery Products                        | 0.1                        | 0.0         | 0.0         |
| Miscellaneous Industrial Processes        | 0.0                        | 0.0         | 0.0         |
| <b>SOLVENT UTILIZATION</b>                | <b>223.4</b>               | <b>0.0</b>  | <b>0.0</b>  |
| Degreasing                                | 15.9                       | 0.0         | 0.0         |
| Graphic Arts                              | 20.7                       | 0.0         | 0.0         |
| Dry Cleaning                              | 0.8                        | 0.0         | 0.0         |
| Surface Coating                           | 147.5                      | 0.0         | 0.0         |
| Other Industrial                          | 3.2                        | 0.0         | 0.0         |
| Nonindustrial                             | 35.4                       | 0.0         | 0.0         |

**Table 1 (continued)**  
**1990 Ozone Season Daily Emissions for the Pennsylvania Counties in the Philadelphia**  
**NAA**  
**Tier 2 Source Category Summary**

| Source Category                         | Daily Emissions (tons/day) |              |               |
|---|----------------------------|--------------|---------------|
|   | VOC                        | NOx          | CO            |
| <b>STORAGE &amp; TRANSPORT</b>          | <b>46.2</b>                | <b>0.0</b>   | <b>0.0</b>    |
| Bulk Terminals & Plants                 | 0.7                        | 0.0          | 0.0           |
| Petroleum & Petroleum Product Storage   | 4.7                        | 0.0          | 0.0           |
| Petroleum & Petroleum Product Transport | 14.4                       | 0.0          | 0.0           |
| Service Stations: Stage I               | 4.2                        | 0.0          | 0.0           |
| Service Stations: Stage II              | 19.6                       | 0.0          | 0.0           |
| Service Stations: Breathing & Emptying  | 1.7                        | 0.0          | 0.0           |
| Organic Chemical Storage                | 0.4                        | 0.0          | 0.0           |
| Organic Chemical Transport              | 0.6                        | 0.0          | 0.0           |
| <b>WASTE DISPOSAL &amp; RECYCLING</b>   | <b>22.0</b>                | <b>1.7</b>   | <b>6.5</b>    |
| Incineration                            | 1.6                        | 1.6          | 5.3           |
| Open Burning                            | 0.2                        | 0.1          | 1.2           |
| POTW                                    | 7.8                        | 0.0          | 0.0           |
| TSDf                                    | 12.3                       | 0.0          | 0.0           |
| Landfills                               | 0.2                        | 0.0          | 0.0           |
| <b>HIGHWAY VEHICLES</b>                 | <b>187.9</b>               | <b>158.3</b> | <b>1710.8</b> |
| Light-Duty Gas Vehicles & Motorcycles   | 167.7                      | 122.9        | 1503.8        |
| Light-Duty Gas Trucks                   | 14.8                       | 12.4         | 161.6         |
| Heavy-Duty Gas Vehicles                 | 2.4                        | 2.2          | 35.0          |
| Diesels                                 | 3.0                        | 20.8         | 10.3          |
| <b>OFF-HIGHWAY</b>                      | <b>88.1</b>                | <b>99.5</b>  | <b>732.6</b>  |
| Non-Road Gasoline                       | 69.9                       | 9.0          | 658.4         |
| Non-Road Diesel                         | 9.8                        | 66.7         | 44.8          |
| Aircraft                                | 7.2                        | 8.2          | 27.1          |
| Railroads                               | 1.1                        | 15.6         | 2.3           |
| <b>MISCELLANEOUS</b>                    | <b>2.3</b>                 | <b>0.3</b>   | <b>12.6</b>   |
| Other Combustion                        | 2.3                        | 0.3          | 12.6          |
| <b>TOTAL</b>                            | <b>612.0</b>               | <b>451.2</b> | <b>2538.0</b> |

Table 2  
1990 Ozone Season Daily VOLATILE ORGANIC COMPOUND Emissions for the  
Philadelphia NAA  
Tier 3 Source Category Summary

| Source Category                          | Pennsylvania<br>Counties | All<br>Counties |
|--|--------------------------|-----------------|
| <b>FUEL COMB. ELEC. UTIL.</b>            | <b>1.0</b>               | <b>8.1</b>      |
| Coal                                     | 0.2                      | 3.9             |
| Oil                                      | 0.5                      | 1.1             |
| Gas                                      | 0.0                      | 0.3             |
| Other                                    |                          | 0.0             |
| Internal Combustion                      | 0.3                      | 2.8             |
| <b>FUEL COMB. INDUSTRIAL</b>             | <b>0.8</b>               | <b>4.3</b>      |
| Coal                                     | 0.0                      | 0.0             |
| Oil                                      | 0.0                      | 1.4             |
| Gas                                      | 0.3                      | 2.3             |
| Other                                    | 0.0                      | 0.0             |
| Internal Combustion                      | 0.5                      | 0.5             |
| <b>FUEL COMB. OTHER</b>                  | <b>1.0</b>               | <b>1.9</b>      |
| Commercial/Institutional Oil             | 0.3                      | 0.5             |
| Commercial/Institutional Gas             | 0.7                      | 0.8             |
| Misc. Fuel Comb. (Except Residential)    | 0.0                      | 0.1             |
| Residential Wood                         | 0.0                      | 0.5             |
| woodstoves                               |                          | 0.2             |
| other                                    |                          | 0.3             |
| Residential Other                        | 0.0                      | 0.2             |
| <b>CHEMICAL &amp; ALLIED PRODUCT MFG</b> | <b>14.8</b>              | <b>52.6</b>     |
| Organic Chemical Mfg                     | 8.8                      | 16.0            |
| ethylene oxide mfg                       |                          | 0.0             |
| phenol mfg                               | 6.6                      | 6.6             |
| terephthalic acid mfg                    | 1.4                      | 1.4             |
| ethylene mfg                             |                          | 0.4             |
| charcoal mfg                             | 0.5                      | 0.5             |
| socmi reactor                            | 0.3                      | 0.8             |
| socmi distillation                       |                          | 0.1             |
| socmi air oxidation processes            |                          | 0.0             |
| socmi fugitives                          |                          | 2.1             |
| other                                    | 0.1                      | 4.2             |
| Inorganic Chemical Mfg                   | 0.1                      | 1.6             |
| Polymer & Resin Mfg                      | 0.7                      | 2.9             |
| polypropylene mfg                        |                          | 0.2             |
| polyethylene mfg                         | 0.5                      | 0.6             |
| polystyrene resins                       |                          | 0.0             |
| synthetic fiber                          |                          | 0.3             |
| styrene/butadiene rubber                 | 0.0                      | 0.5             |
| other                                    | 0.2                      | 1.2             |
| Agricultural Chemical Mfg                |                          | 0.0             |
| Paint, Varnish, Lacquer, Enamel Mfg      | 1.6                      | 1.6             |
| paint & varnish mfg                      | 1.0                      | 1.0             |
| other                                    | 0.6                      | 0.6             |

Table 2 (continued)  
1990 Ozone Season Daily VOLATILE ORGANIC COMPOUND Emissions for the  
Philadelphia NAA  
Tier 3 Source Category Summary

| Source Category                           | Pennsylvania<br>Counties | All<br>Counties |
|---|--------------------------|-----------------|
| Pharmaceutical Mfg                        | 0.8                      | 1.1             |
| Other Chemical Mfg                        | 2.8                      | 29.4            |
| printing ink mfg                          | 0.2                      | 1.2             |
| fugitives unclassified                    |                          | 2.3             |
| other                                     | 2.6                      | 25.9            |
| <b>METALS PROCESSING</b>                  | <b>0.6</b>               | <b>1.7</b>      |
| Non-Ferrous Metals Processing             | 0.2                      | 0.4             |
| Ferrous Metals Processing                 | 0.5                      | 1.3             |
| Metals Processing NEC                     |                          | 0.0             |
| <b>PETROLEUM &amp; RELATED INDUSTRIES</b> | <b>21.5</b>              | <b>31.5</b>     |
| Petroleum Refineries & Related Indust     | 21.2                     | 31.1            |
| vacuum distillation                       | 1.6                      | 1.6             |
| cracking units                            | 0.0                      | 0.7             |
| process unit turnarounds                  | 0.1                      | 1.5             |
| petroleum refinery fugitives              | 12.5                     | 13.3            |
| other                                     | 7.1                      | 14.0            |
| Asphalt Manufacturing                     | 0.3                      | 0.4             |
| <b>OTHER INDUSTRIAL PROCESSES</b>         | <b>2.3</b>               | <b>28.4</b>     |
| Agriculture, Food, & Kindred Products     | 1.5                      | 4.4             |
| bakeries                                  | 0.4                      | 1.3             |
| other                                     | 1.2                      | 3.1             |
| Textiles, Leather, & Apparel Products     |                          | 0.3             |
| Wood, Pulp & Paper, & Publishing Prod     | 0.1                      | 0.1             |
| Rubber & Miscellaneous Plastic Produc     | 0.6                      | 1.6             |
| Mineral Products                          | 0.0                      | 0.2             |
| Machinery Products                        | 0.1                      | 0.3             |
| Electronic Equipment                      |                          | 0.4             |
| Miscellaneous Industrial Processes        | 0.0                      | 21.2            |
| <b>SOLVENT UTILIZATION</b>                | <b>223.4</b>             | <b>351.0</b>    |
| Degreasing                                | 15.9                     | 24.9            |
| open top                                  | 0.2                      | 0.5             |
| conveyorized                              |                          | 0.7             |
| cold cleaning                             | 0.9                      | 1.3             |
| other                                     | 14.9                     | 22.4            |
| Graphic Arts                              | 20.7                     | 26.0            |
| letterpress                               | 0.2                      | 0.2             |
| flexographic                              | 2.2                      | 3.2             |
| lithographic                              | 0.6                      | 0.9             |
| gravure                                   | 11.5                     | 12.0            |
| other                                     | 6.2                      | 9.7             |
| Dry Cleaning                              | 0.8                      | 3.1             |
| perchloroethylene                         |                          | 0.7             |
| petroleum solvent                         | 0.2                      | 0.5             |
| other                                     | 0.5                      | 1.9             |



**Table 2 (continued)**  
**1990 Ozone Season Daily VOLATILE ORGANIC COMPOUND Emissions for the**  
**Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>         | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|--------------------------------|----------------------------------|-------------------------|
| Surface Coating                | 147.5                            | 223.9                   |
| industrial adhesives           | 0.9                              | 1.2                     |
| fabrics                        | 1.9                              | 2.3                     |
| paper                          | 23.9                             | 24.8                    |
| large appliances               | 0.1                              | 0.4                     |
| magnet wire                    |                                  | 0.0                     |
| autos & light trucks           | 0.4                              | 7.4                     |
| metal cans                     | 8.9                              | 18.4                    |
| metal coil                     | 1.2                              | 1.2                     |
| wood furniture                 | 2.9                              | 4.6                     |
| metal furniture                | 7.2                              | 9.7                     |
| flatwood products              | 0.5                              | 1.1                     |
| plastic parts                  | 0.3                              | 0.5                     |
| large ships                    | 0.3                              | 1.1                     |
| aircraft                       | 0.8                              | 1.0                     |
| misc. metal parts              | 2.0                              | 3.9                     |
| steel drums                    |                                  | 0.0                     |
| architectural                  | 30.5                             | 49.3                    |
| traffic markings               | 2.6                              | 5.1                     |
| maintenance coatings           | 4.1                              | 6.7                     |
| railroad                       | 0.1                              | 0.2                     |
| auto refinishing               | 16.3                             | 28.4                    |
| machinery                      | 2.5                              | 4.3                     |
| electronic & other electrical  | 0.3                              | 0.7                     |
| general                        | 2.7                              | 5.9                     |
| miscellaneous                  | 0.2                              | 1.1                     |
| thinning solvents              | 1.1                              | 1.1                     |
| other                          | 35.9                             | 43.5                    |
| Other Industrial               | 3.2                              | 3.3                     |
| Nonindustrial                  | 35.4                             | 69.8                    |
| cutback asphalt                |                                  | 2.1                     |
| other asphalt                  |                                  | 3.4                     |
| pesticide application          | 1.4                              | 10.5                    |
| consumer solvents              |                                  | 19.7                    |
| other                          | 34.1                             | 34.1                    |
| <b>STORAGE &amp; TRANSPORT</b> | <b>46.2</b>                      | <b>90.2</b>             |
| Bulk Terminals & Plants        | 0.7                              | 3.6                     |
| fixed roof                     |                                  | 2.8                     |
| floating roof                  | 0.2                              | 0.2                     |
| efr with seals                 | 0.0                              | 0.0                     |
| ifr with seals                 |                                  | 0.0                     |
| underground tanks              |                                  | 0.2                     |
| other                          | 0.4                              | 0.4                     |

Table 2 (continued)  
1990 Ozone Season Daily VOLATILE ORGANIC COMPOUND Emissions for the  
Philadelphia NAA  
Tier 3 Source Category Summary

| Source Category                         | Pennsylvania<br>Counties | All<br>Counties |
|---|--------------------------|-----------------|
| Petroleum & Petroleum Product Storage   | 4.7                      | 12.2            |
| floating roof gasoline                  | 0.7                      | 1.8             |
| floating roof crude                     | 0.3                      | 0.3             |
| efr / seal gasoline                     | 0.0                      | 3.9             |
| efr / seal crude                        | 0.1                      | 0.2             |
| ifr / seal gasoline                     | 0.0                      | 0.0             |
| other                                   | 3.6                      | 5.9             |
| Petroleum & Petroleum Product Transpo   | 14.4                     | 31.1            |
| gasoline loading: balanced / submerged  | 1.6                      | 1.6             |
| gasoline loading: normal / submerged    | 0.0                      | 0.8             |
| marine vessel loading: gasoline & crude | 5.3                      | 9.1             |
| other                                   | 7.6                      | 19.6            |
| Service Stations: Stage I               | 4.2                      | 7.0             |
| Service Stations: Stage II              | 19.6                     | 25.5            |
| Service Stations: Breathing & Emptyin   | 1.7                      | 3.1             |
| Organic Chemical Storage                | 0.4                      | 6.9             |
| Organic Chemical Transport              | 0.6                      | 0.8             |
| Inorganic Chemical Storage              |                          | 0.0             |
| <b>WASTE DISPOSAL &amp; RECYCLING</b>   | <b>22.0</b>              | <b>46.5</b>     |
| Incineration                            | 1.6                      | 6.4             |
| Open Burning                            | 0.2                      | 13.5            |
| residential                             |                          | 8.9             |
| other                                   | 0.2                      | 4.6             |
| POTW                                    | 7.8                      | 9.9             |
| Industrial Waste Water                  |                          | 3.5             |
| TSDf                                    | 12.3                     | 12.3            |
| Landfills                               | 0.2                      | 0.8             |
| Other                                   |                          | 0.1             |
| <b>HIGHWAY VEHICLES</b>                 | <b>187.9</b>             | <b>366.5</b>    |
| Light-Duty Gas Vehicles & Motorcycles   | 167.7                    | 281.0           |
| light-duty gas vehicles                 | 161.0                    | 272.0           |
| motorcycles                             | 6.7                      | 9.0             |
| Light-Duty Gas Trucks                   | 14.7                     | 64.0            |
| ldgt1                                   | 8.3                      | 36.0            |
| ldgt2                                   | 6.4                      | 28.1            |
| Heavy-Duty Gas Vehicles                 | 2.4                      | 12.3            |
| Diesels                                 | 3.0                      | 9.2             |
| hddv                                    | 1.4                      | 7.1             |
| lddt                                    | 0.2                      | 0.2             |
| lddv                                    | 1.4                      | 1.8             |

Table 2 (continued)  
1990 Ozone Season Daily VOLATILE ORGANIC COMPOUND Emissions for the  
Philadelphia NAA  
Tier 3 Source Category Summary

| Source Category                  | Pennsylvania<br>Counties | All<br>Counties |
|----------------------------------|--------------------------|-----------------|
| <b>OFF-HIGHWAY</b>               | <b>88.1</b>              | <b>156.6</b>    |
| Non-Road Gasoline                | 69.9                     | 123.2           |
| recreational                     | 1.0                      | 2.9             |
| construction                     | 1.8                      | 2.7             |
| industrial                       | 8.1                      | 10.2            |
| lawn & garden                    | 46.9                     | 72.2            |
| farm                             | 0.2                      | 0.5             |
| light commercial                 |                          | 3.8             |
| logging                          |                          | 0.3             |
| recreational marine vessels      | 11.9                     | 30.6            |
| other                            |                          | 0.1             |
| Non-Road Diesel                  | 9.8                      | 16.0            |
| construction                     | 6.6                      | 10.0            |
| industrial                       | 1.5                      | 1.8             |
| lawn & garden                    | 0.0                      | 0.1             |
| farm                             | 1.7                      | 4.1             |
| light commercial                 |                          | 0.0             |
| Aircraft                         | 7.2                      | 12.8            |
| Marine Vessels                   |                          | 2.2             |
| diesel                           |                          | 1.5             |
| residual oil                     |                          | 0.7             |
| Railroads                        | 1.1                      | 2.3             |
| <b>MISCELLANEOUS</b>             | <b>2.3</b>               | <b>6.3</b>      |
| Other Combustion                 | 2.3                      | 4.4             |
| structural fires                 | 2.3                      | 3.3             |
| slash/prescribed burning         |                          | 0.0             |
| forest wildfires                 | 0.0                      | 1.0             |
| cigarette smoke                  |                          | 0.1             |
| Catastrophic/Accidental Releases |                          | 1.8             |
| Health Services                  |                          | 0.0             |
| <b>TOTAL</b>                     | <b>612.0</b>             | <b>1145.7</b>   |

**Table 3**  
**1990 osd emissions from the Philadelphia NAA**  
**Major Source Category Summary**

| <b>Pollutant</b> | <b>Source</b> | <b>PA counties</b> | <b>All Counties</b> |
|------------------|---------------|--------------------|---------------------|
| <b>voc</b>       | area          | 274.1              | 499.1               |
|                  | point         | 150.0              | 280.1               |
|                  | mobile        | 187.9              | 366.5               |
|                  | <b>total</b>  | <b>612.0</b>       | <b>1145.7</b>       |
| <b>nox</b>       | area          | 122.9              | 212.4               |
|                  | point         | 170.0              | 572.7               |
|                  | mobile        | 158.3              | 305.3               |
|                  | <b>total</b>  | <b>451.2</b>       | <b>1090.4</b>       |
| <b>co</b>        | area          | 755.6              | 1288.9              |
|                  | point         | 70.6               | 167.2               |
|                  | mobile        | 1710.8             | 2971.9              |
|                  | <b>total</b>  | <b>2537.0</b>      | <b>4428.0</b>       |



**Table 4**  
**1990 Ozone Season Daily CARBON MONOXIDE Emissions for the Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>                    | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|---|----------------------------------|-------------------------|
| <b>FUEL COMB. ELEC. UTIL.</b>             | <b>6.1</b>                       | <b>28.3</b>             |
| Coal                                      | 1.5                              | 10.9                    |
| Oil                                       | 3.1                              | 6.3                     |
| Gas                                       | 0.4                              | 1.4                     |
| Other                                     | 0.0                              | 0.3                     |
| Internal Combustion                       | 1.1                              | 9.4                     |
| <b>FUEL COMB. INDUSTRIAL</b>              | <b>9.3</b>                       | <b>37.6</b>             |
| Coal                                      | 0.1                              | 0.4                     |
| Oil                                       | 0.9                              | 2.3                     |
| Gas                                       | 5.2                              | 31.4                    |
| Other                                     | 0.0                              | 0.2                     |
| Internal Combustion                       | 3.1                              | 3.2                     |
| <b>FUEL COMB. OTHER</b>                   | <b>5.8</b>                       | <b>12.3</b>             |
| Commercial/Institutional Coal             | 0.0                              | 0.0                     |
| Commercial/Institutional Oil              | 2.6                              | 3.1                     |
| Commercial/Institutional Gas              | 2.7                              | 3.7                     |
| Misc. Fuel Comb. (Except Residential)     | 0.2                              | 0.2                     |
| Residential Wood                          |                                  | 4.1                     |
| woodstoves                                |                                  | 1.6                     |
| other                                     |                                  | 2.5                     |
| Residential Other                         | 0.3                              | 1.1                     |
| <b>CHEMICAL &amp; ALLIED PRODUCT MFG</b>  | <b>0.0</b>                       | <b>30.4</b>             |
| Organic Chemical Mfg                      |                                  | 2.5                     |
| Inorganic Chemical Mfg                    | 0.0                              | 27.5                    |
| pigments; TiO2 chloride process: reactor  |                                  | 27.5                    |
| other                                     | 0.0                              | 0.0                     |
| Polymer & Resin Mfg                       |                                  | 0.0                     |
| Pharmaceutical Mfg                        |                                  | 0.1                     |
| Other Chemical Mfg                        |                                  | 0.3                     |
| <b>METALS PROCESSING</b>                  | <b>36.0</b>                      | <b>36.0</b>             |
| Ferrous Metals Processing                 | 36.0                             | 36.0                    |
| gray iron cupola                          | 12.7                             | 12.7                    |
| other                                     | 23.3                             | 23.3                    |
| Metals Processing NEC                     |                                  | 0.0                     |
| <b>PETROLEUM &amp; RELATED INDUSTRIES</b> | <b>17.9</b>                      | <b>34.3</b>             |
| Petroleum Refineries & Related Industrie  | 17.7                             | 34.0                    |
| fcc units                                 | 16.7                             | 33.0                    |
| other                                     | 1.0                              | 1.0                     |
| Asphalt Manufacturing                     | 0.2                              | 0.3                     |

**Table 4 (continued)**  
**1990 Ozone Season Daily CARBON MONOXIDE Emissions for the Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>                | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|---------------------------------------|----------------------------------|-------------------------|
| <b>OTHER INDUSTRIAL PROCESSES</b>     | <b>0.6</b>                       | <b>0.6</b>              |
| Agriculture, Food, & Kindred Products |                                  | 0.0                     |
| Mineral Products                      | 0.6                              | 0.6                     |
| Miscellaneous Industrial Processes    |                                  | 0.0                     |
| <b>SOLVENT UTILIZATION</b>            | <b>0.0</b>                       | <b>0.0</b>              |
| Graphic Arts                          | 0.0                              | 0.0                     |
| Surface Coating                       | 0.0                              | 0.0                     |
| Other Industrial                      | 0.0                              | 0.0                     |
| <b>WASTE DISPOSAL &amp; RECYCLING</b> | <b>6.5</b>                       | <b>65.4</b>             |
| Incineration                          | 5.3                              | 6.6                     |
| industrial                            | 0.0                              | 0.5                     |
| commercial/institutional              | 0.0                              | 0.9                     |
| other                                 | 5.2                              | 5.3                     |
| Open Burning                          | 1.2                              | 58.8                    |
| residential                           |                                  | 25.3                    |
| other                                 | 1.2                              | 33.5                    |
| <b>HIGHWAY VEHICLES</b>               | <b>1710.8</b>                    | <b>2971.9</b>           |
| Light-Duty Gas Vehicles & Motorcycles | 1503.8                           | 2284.5                  |
| light-duty gas vehicles               | 1479.3                           | 2254.5                  |
| motorcycles                           | 24.5                             | 30.0                    |
| Light-Duty Gas Trucks                 | 161.6                            | 503.3                   |
| ldgt1                                 | 95.0                             | 294.1                   |
| ldgt2                                 | 66.6                             | 209.3                   |
| Heavy-Duty Gas Vehicles               | 35.0                             | 147.2                   |
| Diesels                               | 10.3                             | 36.9                    |
| hddv                                  | 6.4                              | 32.0                    |
| lddt                                  | 0.3                              | 0.5                     |
| lddv                                  | 3.6                              | 4.4                     |
| <b>OFF-HIGHWAY</b>                    | <b>731.6</b>                     | <b>1186.4</b>           |
| Non-Road Gasoline                     | 657.4                            | 1068.0                  |
| recreational                          |                                  | 6.6                     |
| construction                          | 21.3                             | 32.3                    |
| industrial                            | 170.9                            | 202.1                   |
| lawn & garden                         | 428.1                            | 652.7                   |
| farm                                  | 2.2                              | 5.1                     |
| light commercial                      |                                  | 63.3                    |
| logging                               |                                  | 0.8                     |
| recreational marine vessels           | 34.9                             | 104.9                   |
| other                                 |                                  | 0.1                     |

Table 4 (continued)  
 1990 Ozone Season Daily CARBON MONOXIDE Emissions for the Philadelphia NAA  
 Tier 3 Source Category Summary

| Source Category          | Pennsylvania<br>Counties | All<br>Counties |
|--------------------------|--------------------------|-----------------|
| Non-Road Diesel          | 44.8                     | 71.7            |
| construction             | 30.7                     | 46.7            |
| industrial               | 7.2                      | 8.5             |
| lawn & garden            | 0.2                      | 0.3             |
| farm                     | 6.7                      | 16.0            |
| light commercial         |                          | 0.3             |
| Aircraft                 | 27.1                     | 38.0            |
| Marine Vessels           |                          | 4.8             |
| diesel                   |                          | 3.4             |
| residual oil             |                          | 1.3             |
| Railroads                | 2.3                      | 4.0             |
| <b>MISCELLANEOUS</b>     | <b>12.6</b>              | <b>24.9</b>     |
| Other Combustion         | 12.6                     | 24.9            |
| structural fires         | 12.5                     | 18.2            |
| slash/prescribed burning |                          | 0.7             |
| forest wildfires         | 0.1                      | 5.8             |
| cigarette smoke          |                          | 0.2             |
| <b>TOTAL</b>             | <b>2537.0</b>            | <b>4428.0</b>   |



**Table 5**  
**1990 Ozone Season Daily OXIDES OF NITROGEN Emissions for the Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>                | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|---------------------------------------|----------------------------------|-------------------------|
| <b>FUEL COMB. ELEC. UTIL.</b>         | <b>74.2</b>                      | <b>367.4</b>            |
| Coal                                  | 38.8                             | 215.2                   |
| bituminous                            | 28.6                             | 205.0                   |
| anthracite & lignite                  | 10.2                             | 10.2                    |
| Oil                                   | 25.6                             | 60.5                    |
| residual                              | 24.5                             | 52.9                    |
| distillate                            | 1.1                              | 7.6                     |
| Gas                                   | 5.1                              | 17.6                    |
| natural                               | 2.1                              | 10.3                    |
| process                               | 3.0                              | 7.4                     |
| Other                                 | 0.4                              | 9.9                     |
| Internal Combustion                   | 4.4                              | 64.2                    |
| <b>FUEL COMB. INDUSTRIAL</b>          | <b>76.0</b>                      | <b>176.9</b>            |
| Coal                                  | 4.8                              | 9.5                     |
| bituminous                            | 4.5                              | 5.9                     |
| anthracite & lignite                  | 0.3                              | 0.3                     |
| other                                 |                                  | 3.4                     |
| Oil                                   | 10.3                             | 23.4                    |
| residual                              | 5.4                              | 14.0                    |
| distillate                            | 0.3                              | 3.1                     |
| other                                 | 4.6                              | 6.4                     |
| Gas                                   | 42.8                             | 123.7                   |
| natural                               | 24.7                             | 66.6                    |
| process                               | 18.1                             | 57.1                    |
| Other                                 | 0.7                              | 2.0                     |
| liquid waste                          | 0.7                              | 0.8                     |
| other                                 |                                  | 1.2                     |
| Internal Combustion                   | 17.4                             | 18.2                    |
| <b>FUEL COMB. OTHER</b>               | <b>26.8</b>                      | <b>38.3</b>             |
| Commercial/Institutional Coal         | 0.8                              | 0.8                     |
| Commercial/Institutional Oil          | 10.9                             | 14.1                    |
| Commercial/Institutional Gas          | 13.6                             | 18.5                    |
| Misc. Fuel Comb. (Except Residential) | 0.7                              | 1.0                     |
| Residential Wood                      |                                  | 0.0                     |
| Residential Other                     | 0.9                              | 3.8                     |
| distillate oil                        |                                  | 1.0                     |
| natural gas                           |                                  | 1.7                     |
| other                                 | 0.9                              | 1.1                     |

**Table 5 (continued)**  
**1990 Ozone Season Daily OXIDES OF NITROGEN Emissions for the Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>                    | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|---|----------------------------------|-------------------------|
| <b>CHEMICAL &amp; ALLIED PRODUCT MFG</b>  | <b>0.1</b>                       | <b>10.9</b>             |
| Organic Chemical Mfg                      |                                  | 0.1                     |
| Inorganic Chemical Mfg                    | 0.1                              | 0.3                     |
| Polymer & Resin Mfg                       | 0.0                              | 0.0                     |
| Agricultural Chemical Mfg                 |                                  | 0.0                     |
| Paint, Varnish, Lacquer, Enamel Mfg       |                                  | 0.0                     |
| Other Chemical Mfg                        |                                  | 10.5                    |
| <b>METALS PROCESSING</b>                  | <b>1.5</b>                       | <b>1.6</b>              |
| Non-Ferrous Metals Processing             | 0.0                              | 0.0                     |
| Ferrous Metals Processing                 | 1.5                              | 1.5                     |
| Metals Processing NEC                     |                                  | 0.1                     |
| <b>PETROLEUM &amp; RELATED INDUSTRIES</b> | <b>10.0</b>                      | <b>10.8</b>             |
| Petroleum Refineries & Related Industries | 9.8                              | 10.5                    |
| Asphalt Manufacturing                     | 0.2                              | 0.3                     |
| <b>OTHER INDUSTRIAL PROCESSES</b>         | <b>2.8</b>                       | <b>4.3</b>              |
| Agriculture, Food, & Kindred Products     | 0.0                              | 0.0                     |
| Mineral Products                          | 2.8                              | 2.8                     |
| glass mfg                                 | 1.8                              | 1.8                     |
| other                                     | 1.0                              | 1.0                     |
| Machinery Products                        | 0.0                              | 0.1                     |
| Miscellaneous Industrial Processes        |                                  | 1.4                     |
| <b>SOLVENT UTILIZATION</b>                | <b>0.0</b>                       | <b>0.4</b>              |
| Surface Coating                           | 0.0                              | 0.4                     |
| Other Industrial                          | 0.0                              | 0.0                     |
| <b>STORAGE &amp; TRANSPORT</b>            |                                  | <b>0.0</b>              |
| Organic Chemical Storage                  |                                  | 0.0                     |
| <b>WASTE DISPOSAL &amp; RECYCLING</b>     | <b>1.7</b>                       | <b>4.7</b>              |
| Incineration                              | 1.6                              | 1.9                     |
| Open Burning                              | 0.1                              | 2.8                     |
| <b>HIGHWAY VEHICLES</b>                   | <b>158.3</b>                     | <b>305.3</b>            |
| Light-Duty Gas Vehicles & Motorcycles     | 122.9                            | 196.2                   |
| light-duty gas vehicles                   | 122.0                            | 195.1                   |
| motorcycles                               | 0.9                              | 1.1                     |
| Light-Duty Gas Trucks                     | 12.4                             | 40.7                    |
| ldgt1                                     | 7.1                              | 24.2                    |
| ldgt2                                     | 5.3                              | 16.5                    |
| Heavy-Duty Gas Vehicles                   | 2.2                              | 7.4                     |
| Diesels                                   | 20.8                             | 61.1                    |
| hddv                                      | 15.4                             | 54.6                    |
| lddt                                      | 0.5                              | 0.7                     |
| lddv                                      | 4.9                              | 5.8                     |

**Table 5 (continued)**  
**1990 Ozone Season Daily OXIDES OF NITROGEN Emissions for the Philadelphia NAA**  
**Tier 3 Source Category Summary**

| <b>Source Category</b>      | <b>Pennsylvania<br/>Counties</b> | <b>All<br/>Counties</b> |
|-----------------------------|----------------------------------|-------------------------|
| <b>OFF-HIGHWAY</b>          | <b>99.5</b>                      | <b>169.3</b>            |
| Non-Road Gasoline           | 9.0                              | 13.1                    |
| recreational                | 3.5                              | 3.5                     |
| construction                | 0.2                              | 0.2                     |
| industrial                  | 4.1                              | 6.1                     |
| lawn & garden               | 0.5                              | 0.7                     |
| farm                        | 0.0                              | 0.0                     |
| light commercial            |                                  | 0.0                     |
| logging                     |                                  | 0.0                     |
| recreational marine vessels | 0.7                              | 2.1                     |
| other                       |                                  | 0.4                     |
| Non-Road Diesel             | 66.7                             | 111.3                   |
| construction                | 53.1                             | 81.9                    |
| industrial                  | 6.4                              | 9.4                     |
| lawn & garden               | 0.3                              | 0.5                     |
| farm                        | 6.9                              | 19.0                    |
| light commercial            |                                  | 0.4                     |
| Aircraft                    | 8.2                              | 9.7                     |
| Marine Vessels              |                                  | 13.4                    |
| diesel                      |                                  | 9.2                     |
| residual oil                |                                  | 4.2                     |
| Railroads                   | 15.6                             | 21.8                    |
| <b>MISCELLANEOUS</b>        | <b>0.3</b>                       | <b>0.6</b>              |
| Other Combustion            | 0.3                              | 0.6                     |
| <b>TOTAL</b>                | <b>451.2</b>                     | <b>1090.4</b>           |



**Table 6**  
**Ozone Season Daily Emission Estimates for the Pennsylvania Counties**  
**in the Philadelphia NAA**  
**Tier 2 Source Category Summary**

| Source Category                           | VOC Emissions |             | NOx Emissions |             | CO Emissions |             |
|---|---------------|-------------|---------------|-------------|--------------|-------------|
|   | 1990          | 1996        | 1990          | 1996        | 1990         | 1996        |
| <b>FUEL COMB. ELEC. UTIL.</b>             | <b>1.0</b>    | <b>1.3</b>  | <b>74.2</b>   | <b>80.8</b> | <b>6.1</b>   | <b>8.3</b>  |
| Coal                                      | 0.2           | 0.2         | 38.8          | 38.6        | 1.5          | 2.1         |
| Oil                                       | 0.5           | 0.7         | 25.6          | 33.2        | 3.1          | 4.5         |
| Gas                                       | 0.0           | 0.0         | 5.1           | 5.6         | 0.4          | 0.5         |
| Other                                     | 0.0           | 0.0         | 0.4           | 0.4         | 0.0          | 0.0         |
| Internal Combustion                       | 0.3           | 0.4         | 4.4           | 3.1         | 1.1          | 1.2         |
| <b>FUEL COMB. INDUSTRIAL</b>              | <b>0.8</b>    | <b>0.8</b>  | <b>76.0</b>   | <b>45.2</b> | <b>9.3</b>   | <b>9.4</b>  |
| Coal                                      | 0.0           | 0.0         | 4.8           | 3.4         | 0.1          | 0.2         |
| Oil                                       | 0.0           | 0.0         | 10.3          | 5.9         | 0.9          | 0.9         |
| Gas                                       | 0.3           | 0.3         | 42.8          | 23.6        | 5.2          | 5.0         |
| Other                                     | 0.0           | 0.0         | 0.7           | 0.6         | 0.0          | 0.0         |
| Internal Combustion                       | 0.5           | 0.5         | 17.4          | 11.7        | 3.1          | 3.3         |
| <b>FUEL COMB. OTHER</b>                   | <b>1.0</b>    | <b>1.0</b>  | <b>26.8</b>   | <b>25.6</b> | <b>5.8</b>   | <b>5.9</b>  |
| Commercial/Institutional Coal             | 0.0           | 0.0         | 0.8           | 0.5         | 0.0          | 0.0         |
| Commercial/Institutional Oil              | 0.3           | 0.3         | 10.9          | 10.1        | 2.6          | 2.6         |
| Commercial/Institutional Gas              | 0.7           | 0.7         | 13.6          | 13.6        | 2.7          | 2.8         |
| Misc. Fuel Comb. (Except Residential)     | 0.0           | 0.0         | 0.7           | 0.4         | 0.2          | 0.2         |
| Residential Other                         | 0.0           | 0.0         | 0.9           | 0.9         | 0.3          | 0.3         |
| <b>CHEMICAL &amp; ALLIED PRODUCT MFG</b>  | <b>14.8</b>   | <b>11.6</b> | <b>0.1</b>    | <b>0.1</b>  | <b>0.0</b>   | <b>0.0</b>  |
| Organic Chemicals                         | 8.8           | 5.8         | 0.0           | 0.0         | 0.0          | 0.0         |
| Inorganic Chemicals                       | 0.1           | 0.1         | 0.1           | 0.0         | 0.0          | 0.0         |
| Polymers & Resins                         | 0.7           | 0.6         | 0.0           | 0.0         | 0.0          | 0.0         |
| Paints, Varnishes, Lacquers, Enamels      | 1.6           | 1.3         | 0.0           | 0.0         | 0.0          | 0.0         |
| Pharmaceuticals                           | 0.8           | 0.8         | 0.0           | 0.0         | 0.0          | 0.0         |
| Other Chemicals                           | 2.8           | 2.9         | 0.0           | 0.0         | 0.0          | 0.0         |
| <b>METALS PROCESSING</b>                  | <b>0.6</b>    | <b>0.6</b>  | <b>1.5</b>    | <b>0.9</b>  | <b>36.0</b>  | <b>32.2</b> |
| Non-Ferrous Metals Processing             | 0.2           | 0.1         | 0.0           | 0.0         | 0.0          | 0.0         |
| Ferrous Metals Processing                 | 0.5           | 0.4         | 1.5           | 0.9         | 36.0         | 32.2        |
| <b>PETROLEUM &amp; RELATED INDUSTRIES</b> | <b>21.5</b>   | <b>19.6</b> | <b>10.0</b>   | <b>6.0</b>  | <b>17.9</b>  | <b>17.8</b> |
| Petroleum Refineries & Related Industries | 21.2          | 19.3        | 9.8           | 5.8         | 17.7         | 17.6        |
| Asphalt Manufacturing                     | 0.3           | 0.3         | 0.2           | 0.2         | 0.2          | 0.2         |
| <b>OTHER INDUSTRIAL PROCESSES</b>         | <b>2.3</b>    | <b>2.2</b>  | <b>2.8</b>    | <b>2.1</b>  | <b>0.6</b>   | <b>0.6</b>  |
| Agriculture, Food, & Kindred Products     | 1.5           | 1.3         | 0.0           | 0.0         | 0.0          | 0.0         |
| Wood, Pulp & Paper, & Publishing Products | 0.1           | 0.1         | 0.0           | 0.0         | 0.0          | 0.0         |
| Rubber & Miscellaneous Plastic Products   | 0.6           | 0.7         | 0.0           | 0.0         | 0.0          | 0.0         |
| Mineral Products                          | 0.0           | 0.0         | 2.8           | 2.1         | 0.6          | 0.6         |
| Machinery Products                        | 0.1           | 0.1         | 0.0           | 0.0         | 0.0          | 0.0         |
| Miscellaneous Industrial Processes        | 0.0           | 0.0         | 0.0           | 0.0         | 0.0          | 0.0         |

**Table 6 (continued)**  
**Ozone Season Daily Emission Estimates for the Pennsylvania Counties**  
**in the Philadelphia NAA**  
**Tier 2 Source Category Summary**

| Source Category                         | VOC Emissions |              | NOx Emissions |              | CO Emissions  |               |
|---|---------------|--------------|---------------|--------------|---------------|---------------|
|   | 1990          | 1996         | 1990          | 1996         | 1990          | 1996          |
| <b>SOLVENT UTILIZATION</b>              | <b>223.4</b>  | <b>208.0</b> | <b>0.0</b>    | <b>0.0</b>   | <b>0.0</b>    | <b>0.0</b>    |
| Degreasing                              | 15.9          | 15.2         | 0.0           | 0.0          | 0.0           | 0.0           |
| Graphic Arts                            | 20.7          | 21.0         | 0.0           | 0.0          | 0.0           | 0.0           |
| Dry Cleaning                            | 0.8           | 0.8          | 0.0           | 0.0          | 0.0           | 0.0           |
| Surface Coating                         | 147.5         | 131.5        | 0.0           | 0.0          | 0.0           | 0.0           |
| Other Industrial                        | 3.2           | 3.3          | 0.0           | 0.0          | 0.0           | 0.0           |
| Nonindustrial                           | 35.4          | 36.2         | 0.0           | 0.0          | 0.0           | 0.0           |
| <b>STORAGE &amp; TRANSPORT</b>          | <b>46.2</b>   | <b>31.8</b>  | <b>0.0</b>    | <b>0.0</b>   | <b>0.0</b>    | <b>0.0</b>    |
| Bulk Terminals & Plants                 | 0.7           | 0.7          | 0.0           | 0.0          | 0.0           | 0.0           |
| Petroleum & Petroleum Product Storage   | 4.7           | 4.7          | 0.0           | 0.0          | 0.0           | 0.0           |
| Petroleum & Petroleum Product Transport | 14.4          | 13.8         | 0.0           | 0.0          | 0.0           | 0.0           |
| Service Stations: Stage I               | 4.2           | 4.6          | 0.0           | 0.0          | 0.0           | 0.0           |
| Service Stations: Stage II              | 19.6          | 5.2          | 0.0           | 0.0          | 0.0           | 0.0           |
| Service Stations: Breathing & Emptying  | 1.7           | 1.8          | 0.0           | 0.0          | 0.0           | 0.0           |
| Organic Chemical Storage                | 0.4           | 0.4          | 0.0           | 0.0          | 0.0           | 0.0           |
| Organic Chemical Transport              | 0.6           | 0.6          | 0.0           | 0.0          | 0.0           | 0.0           |
| <b>WASTE DISPOSAL &amp; RECYCLING</b>   | <b>22.0</b>   | <b>13.1</b>  | <b>1.7</b>    | <b>1.7</b>   | <b>6.5</b>    | <b>6.7</b>    |
| Incineration                            | 1.6           | 1.6          | 1.6           | 1.7          | 5.3           | 5.4           |
| Open Burning                            | 0.2           | 0.2          | 0.1           | 0.1          | 1.2           | 1.3           |
| POTW                                    | 7.8           | 8.0          | 0.0           | 0.0          | 0.0           | 0.0           |
| TSDf                                    | 12.3          | 3.1          | 0.0           | 0.0          | 0.0           | 0.0           |
| Landfills                               | 0.2           | 0.2          | 0.0           | 0.0          | 0.0           | 0.0           |
| <b>HIGHWAY VEHICLES</b>                 | <b>187.9</b>  | <b>139.2</b> | <b>158.3</b>  | <b>149.6</b> | <b>1710.8</b> | <b>987.2</b>  |
| Light-Duty Gas Vehicles & Motorcycles   | 167.7         | 123.9        | 122.9         | 119.2        | 1503.8        | 866.5         |
| Light-Duty Gas Trucks                   | 14.7          | 10.7         | 12.4          | 11.9         | 161.6         | 93.4          |
| Heavy-Duty Gas Vehicles                 | 2.4           | 1.4          | 2.2           | 2.3          | 35.0          | 16.2          |
| Diesels                                 | 3.0           | 3.2          | 20.8          | 16.3         | 10.3          | 11.1          |
| <b>OFF-HIGHWAY</b>                      | <b>88.1</b>   | <b>88.4</b>  | <b>99.5</b>   | <b>100.2</b> | <b>731.6</b>  | <b>742.1</b>  |
| Non-Road Gasoline                       | 69.9          | 69.1         | 9.0           | 9.0          | 657.4         | 663.1         |
| Non-Road Diesel                         | 9.8           | 10.0         | 66.7          | 68.2         | 44.8          | 45.5          |
| Aircraft                                | 7.2           | 8.4          | 8.2           | 9.5          | 27.1          | 31.6          |
| Railroads                               | 1.1           | 1.0          | 15.6          | 13.5         | 2.3           | 2.0           |
| <b>MISCELLANEOUS</b>                    | <b>2.3</b>    | <b>2.3</b>   | <b>0.3</b>    | <b>0.3</b>   | <b>12.6</b>   | <b>12.6</b>   |
| Other Combustion                        | 2.3           | 2.3          | 0.3           | 0.3          | 12.6          | 12.6          |
| <b>Total</b>                            | <b>612.0</b>  | <b>519.9</b> | <b>451.2</b>  | <b>412.5</b> | <b>2537.0</b> | <b>1822.8</b> |

## 1996 VOC Emissions Distribution Five County Area

| Source Categories          | tpd   | Percentage |
|----------------------------|-------|------------|
| Fuel Combustion            | 3.1   | 0.5%       |
| Industrial Processes       | 34.0  | 6.5        |
| Solvent Utilization        | 208.0 | 40.0       |
| Storage and Transport      | 31.8  | 6.1        |
| Waste Disposal & Recycling | 13.1  | 2.5        |
| Highway Vehicles           | 139.2 | 26.8       |
| Off-Highway Vehicles       | 88.4  | 17.0       |
| Miscellaneous              | 2.3   | 0.4        |
| Total                      | 519.9 | 100.0%     |

## 1996 NO<sub>x</sub> Emissions Distribution Five County Area

| <b>Source Categories</b>   | <b>tpd</b>   | <b>Percentage</b> |
|----------------------------|--------------|-------------------|
| Fuel Combustion            | 151.6        | 36.8%             |
| Industrial Processes       | 9.1          | 2.2               |
| Waste Disposal & Recycling | 1.7          | 0.3               |
| Highway Vehicles           | 149.6        | 36.2              |
| Off-Highway Vehicles       | 100.2        | 24.3              |
| Miscellaneous              | 0.3          | 0.0               |
| <b>Total</b>               | <b>412.5</b> | <b>100.0%</b>     |





# Primary Controls Affecting 1996 Emissions

Federal Motor Vehicle Emission Control Program

Current I/M

Phase 1 Federal Reformulated Gasoline

RACT to Major Stationary Sources ( $> 25$  tpy VOC and  $\text{NO}_x$ )

Stage II Vapor Recovery

| Selected Categories              | VOC Emissions (tons per summer day) |       | Percentage Reduction |
|----------------------------------|-------------------------------------|-------|----------------------|
|                                  | 1990                                | 1996  |                      |
| Highway Vehicles                 | 187.9                               | 139.2 | 26 %                 |
| Service Stations                 | 25.5                                | 11.6  | 55 %                 |
| RACT to Major Stationary Sources | 150.0                               | 127.0 | 15 %                 |
| Rule Effectiveness Improvements  |                                     |       |                      |
| Hazardous Waste TSD Rule         | 12.3                                | 3.1   | 75 %                 |

# **15% Plan Measures That Have Not Affected 1996 Emissions**

Architectural and Industrial Maintenance Coating

Autobody Refinishing

High Enhanced I/M

Consumer Products Rule



# EPA Guidance for Projecting Emissions

Growth Factor Options (in order of preference):

- Product Output
- Value Added
  - revenue minus production costs
- Earnings
- Employment

| Source Category                           | Growth Indicator                          | Level of Detail                  |
|---|---|----------------------------------|
| <b>Point Sources:</b>                     |   |                                  |
| Nonutility                                | Earnings by Industry                      | Pennsylvania                     |
| Utility                                   | Fuel Consumption                          | Mid-Atlantic Region <sup>1</sup> |
| <b>Area Sources:</b>                      |   |                                  |
| Surface Coating                           | Employment by Industry                    | Pennsylvania                     |
| Residential/Commercial Combustion         | Population                                | Pennsylvania                     |
| Gasoline Distribution                     | VMT                                       | Pennsylvania                     |
| Waste Disposal                            | Population                                | Pennsylvania                     |
| Graphic Arts                              | Printing Industry<br>Employment           | Pennsylvania                     |
| Dry Cleaning                              | Population                                | Pennsylvania                     |
| Nonindustrial Solvent Use                 | Population                                | Pennsylvania                     |
| <b>Nonroad Engines:</b>                   |   |                                  |
| Lawn/Garden Equipment                     | Population                                | Pennsylvania                     |
| Industrial Equipment                      | Employment - Durable<br>Goods Manufacture | Pennsylvania                     |
| Construction Equipment                    | Employment -<br>Construction              | Pennsylvania                     |
| Agricultural Equipment                    | Employment -<br>Agriculture               | Pennsylvania                     |
| Recreational Vehicles                     | Population                                | Pennsylvania                     |
| <b>Transportation (Nonroad Vehicles):</b> |   |                                  |
| Aircraft                                  | Employment - Air<br>Transportation        | Pennsylvania                     |
| Marine Vessels                            | Employment - Water<br>Transportation      | Pennsylvania                     |
| Railroads                                 | Employment - Rail<br>Transportation       | Pennsylvania                     |

NOTE: <sup>1</sup>The Mid-Atlantic Region includes all of New Jersey and Delaware, and the Eastern portions of Maryland and Pennsylvania.

# Growth Factors: Development and Application

$$GFACT_{9096} = \frac{GKEY_{96}}{GKEY_{90}}$$

where:

$GFACT_{9096}$  = 1990-1996 growth factor

$GKEY_{96}$  = value of growth indicator in 1996

$GKEY_{90}$  = value of growth indicator in 1990

EXAMPLE: Pennsylvania Population Growth 1990 to 1996

$$POP_{9096} = \frac{12,356,000}{12,091,000} = 1.022$$

**Summary of Earnings Growth Factors for  
Significant Non-Utility Point Source Categories by 2-Digit SIC Code**

| SIC Code | Industry Name                 | Growth Factor for: |           | Percentage of Philadelphia's<br>1990 Point Source Emissions: |                 |
|----------|-------------------------------|--------------------|-----------|--|-----------------|
|          |                               | 1990-1996          | 1990-2005 | VOC  | NO <sub>x</sub> |
| 26       | Paper Products                | 1.077              | 1.192     | 15.3%  | 10.5%           |
| 27       | Printing/Publishing           | 1.109              | 1.264     | 8.2%   | 0.0%            |
| 28       | Chemical Products             | 1.042              | 1.119     | 10.3%  | 4.7%            |
| 29       | Petroleum/Coal Products       | 0.993              | 1.008     | 25.8%  | 28.3%           |
| 30       | Rubber/Plastic Products       | 1.124              | 1.294     | 3.6%   | 0.1%            |
| 32       | Stone, Clay, Glass Products   | 1.014              | 1.055     | 0.1%   | 1.1%            |
| 33       | Primary Metal Industries      | 0.895              | 0.816     | 0.5%   | 8.5%            |
| 34       | Fabricated Metal Products     | 1.087              | 1.173     | 2.9%   | 0.0%            |
| 36       | Electronic Equipment          | 0.965              | 0.955     | 0.8%   | 0.1%            |
| 37       | Transportation Equipment      | 1.047              | 1.125     | 0.8%   | 0.1%            |
| 39       | Miscellaneous Manufacturing   | 1.033              | 1.081     | 24.8%  | 0.1%            |
| 46       | Pipelines, except Natural Gas | 1.039              | 1.094     | 1.1%   | 0.0%            |
| 51       | Wholesale Trade-Nondurables   | 1.085              | 1.207     | 1.3%   | 0.0%            |
| 97       | National Security             | 1.059              | 1.154     | 0.8%   | 2.5%            |



### Growth Factor Summary: Stationary Area Source Categories

| Source Category                      | Growth Indicator                          | Growth Factor for: |           | Percentage of Philadelphia's<br>1990 Area Source Emissions: |                 |
|--------------------------------------|---|--------------------|-----------|---|-----------------|
|                                      |   | 1990-1996          | 1990-2005 | VOC   | NO <sub>x</sub> |
| Solvent Utilization                  |   |                    |           | 42.7%   | 0.0%            |
| Surface Coating:                     |   |                    |           |   |                 |
| Automotive Refinishing               | Population                                | 1.022              | 1.052     |   |                 |
| Traffic Line Painting                | Population                                | 1.022              | 1.052     |   |                 |
| Factory Finished Wood                | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Metal Furniture/Fixtures             | Employment-Furniture Mfg                  | 1.056              | 1.125     |   |                 |
| Architectural Surface Coating        | Population                                | 1.022              | 1.052     |   |                 |
| Electrical Insulation                | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Metal Cans                           | Employment-Fabricated Metals              | 1.018              | 1.014     |   |                 |
| Miscellaneous Finished Metals        | Employment-Fabricated Metals              | 1.018              | 1.014     |   |                 |
| Machinery & Equipment                | Employment-Nonelectric Machine Mfg        | 0.973              | 0.940     |   |                 |
| Wood Furniture                       | Employment-Furniture Mfg                  | 1.056              | 1.125     |   |                 |
| Electrical Appliances                | Employment-Electric Machine Mfg           | 0.911              | 0.827     |   |                 |
| Motor Vehicles                       | Employment-Motor Vehicle Mfg              | 0.969              | 0.926     |   |                 |
| Other Transportation                 | Employment-Other Transportation Equipment | 1.128              | 1.269     |   |                 |
| Marine Solvents                      | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Railroad Solvents                    | Employment-Railroads                      | 0.865              | 0.762     |   |                 |
| High Performance Industrial Coatings | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Miscellaneous Manufacturing          | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Other Special Purpose Coatings       | Employment-Durable Goods                  | 0.970              | 0.938     |   |                 |
| Graphic Arts                         | Employment-Printing                       | 1.054              | 1.109     | 2.1%  | 0.0%            |
| Degreasing                           | Employment-Durable Goods                  | 0.970              | 0.938     | 7.9%  | 0.0%            |
| Dry Cleaning                         | Population                                | 1.022              | 1.052     | 0.3%  | 0.0%            |
| Consumer/Commercial Solvent Use      | Population                                | 1.022              | 1.052     | 19.1%   | 0.0%            |

**Growth Factor Summary:  
Stationary Area Source Categories (continued)**

| Source Category                         | Growth Indicator              | Growth Factor for: |           | Percentage of Philadelphia's<br>1990 Area Source Emissions: |                 |
|---|-------------------------------|--------------------|-----------|---|-----------------|
|   |                               | 1990-1996          | 1990-2005 | VOC   | NO <sub>x</sub> |
| Other Industrial Processes              |                               |                    |           |   |                 |
| Agriculture, Food & Kindred Products    | Employment-Food Manufacturing | 0.990              | 0.965     | 0.5%  | 0.0%            |
| Miscellaneous Fuel Combustion           |                               |                    |           |   |                 |
| Commercial/Institutional Oil            | Population                    | 1.022              | 1.052     | 0.2%  | 37.8%           |
| Commercial/Institutional Gas            | Population                    | 1.022              | 1.052     | 0.3%  | 50.3%           |
| Residential-Other                       | Population                    | 1.022              | 1.052     | 0.0%  | 3.7%            |
| Storage & Transport                     |                               |                    |           |   |                 |
| Service Stations: Stage I               | VMT                           | 1.102              | 1.211     | 2.3%  | 0.0%            |
| Service Stations: Stage II              | VMT                           | 1.102              | 1.211     | 10.5%   | 0.0%            |
| Petroleum & Petroleum Product Storage   | VMT                           | 1.102              | 1.211     | 0.0%  | 0.0%            |
| Petroleum & Petroleum Product Transport | VMT                           | 1.102              | 1.211     | 0.1%  | 0.0%            |
| Service Stations: Breathing & Emptying  | VMT                           | 1.102              | 1.211     | 0.9%  | 0.0%            |
| Waste Disposal & Recycling              |                               |                    |           |   |                 |
| Landfills                               | Population                    | 1.022              | 1.052     | 0.1%  | 0.0%            |
| POTWs                                   | Population                    | 1.022              | 1.052     | 4.2%  | 0.0%            |
| Open Burning                            | Population                    | 1.022              | 1.052     | 0.1%  | 0.3%            |
| Incineration                            | Population                    | 1.022              | 1.052     | 0.8%  | 6.7%            |
| TSDFs                                   | Population                    | 1.022              | 1.052     | 6.6%  | 0.0%            |
| Miscellaneous Sources                   |                               |                    |           |   |                 |
| Other Combustion                        | Population                    | 1.022              | 1.052     | 1.2%  | 1.3%            |
| Forest Fires                            | Zero growth                   | 1.000              | 1.000     | 0.0%  | 0.0%            |
| Structure Fires                         | Zero Growth                   | 1.000              | 1.000     | 0.0%  | 0.0%            |

## Growth Factor Summary: Nonroad Source Categories

| Source Category           | Growth Indicator                | Growth Factor for: |           | Percentage of Philadelphia's<br>1990 Nonroad Emissions: |                 |
|---------------------------|---------------------------------|--------------------|-----------|---|-----------------|
|                           |                                 | 1990-1996          | 1990-2005 | VOC   | NO <sub>x</sub> |
| Nonroad Gasoline Engines: |                                 |                    |           | 79.4%   | 9.4%            |
| Lawn/Garden               | Population                      | 1.022              | 1.052     |   |                 |
| Airport Equip             | Employment-Air Transportation   | 1.164              | 1.310     |   |                 |
| Recreational Eq           | Population                      | 1.022              | 1.052     |   |                 |
| Recreational Vessels      | Population                      | 1.022              | 1.052     |   |                 |
| Lt. Commercial Eq         | Employment-Durable Goods Mfg    | 0.970              | 0.938     |   |                 |
| Nonroad Diesel Engines:   |                                 |                    |           | 11.2%   | 66.8%           |
| Industrial Eq             | Employment-Durable Goods Mfg    | 0.970              | 0.938     |   |                 |
| Construction Eq           | Employment-Construction         | 1.036              | 1.072     |   |                 |
| Agricultural Eq           | Employment-Farm                 | 0.967              | 0.923     |   |                 |
| Logging Eq                | Employment-Logging              | 1.088              | 1.182     |   |                 |
| Marine Vessels            | Employment-Water Transportation | 0.920              | 0.847     |   |                 |
| Aircraft                  | Employment-Air Transportation   | 1.164              | 1.310     | 8.2%  | 8.2%            |
| Railroads                 | Employment-Railroads            | 0.865              | 0.762     | 1.3%  | 15.6%           |

## Emission Projection Sample Calculation

$$EMISS_{PY} = EMISS_{BY} * GFACT_{BYPY}$$

where:

$EMISS_{PY}$  = emissions in the projection year  
 $EMISS_{BY}$  = emissions in the base year (1990)  
 $GFACT_{BYPY}$  = growth factor from base year to projection year

EXAMPLE: Nonindustrial Solvent Utilization  
growth indicator = population =  $POP_{9096} = 1.022$   
base year emissions = 35 tons per day (tpd)

$$EMISS_{96} = 35 * 1.022 = 35.77 \text{ tpd}$$



# Growth Factors for Utility Emissions

- Based on fuel consumption projections by U.S. Department of Energy
- Includes utilities and nonutilities
- Projections for EMM Region Mid-Atlantic Area Council:
  - New Jersey
  - Delaware
  - Maryland (Eastern)
  - Pennsylvania (Eastern)